

Steve McCallum
February 08, 2021

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

JERRY BLASINGAME,)	
)	
Plaintiff,)	CASE NO:
)	1:19-CV-2047-SCJ
-vs-)	
)	
)	
OFFICER T. GRUBBS #6416,)	
and CITY OF ATLANTA/)	
ATLANTA POLICE DEPARTMENT,)	
)	
Defendants.)	
_____)	

DEPOSITION OF STEVE MCCALLUM

(Pages 1 through 141)

(Via Video Conference)

Monday, February 8, 2021

(10:00 a.m. to 1:45 p.m.)

Stenography Reported By:

Kendra B. James, RDR, CRR

Georgia Certified Court Reporter

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(Due to the large size of the exhibits, the link of the exhibits were emailed to the attorneys.)

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1 THE COURT REPORTER: This is the deposition of
2 Steven McCallum. Pursuant to Article 8.B. of the Rules
3 and Regulations of the Board of Court Reporting of
4 Judicial Council of Georgia, I make the following
5 disclosure.

6 I, Kendra James, am a Georgia certified court
7 reporter. I am here as an independent contractor for
8 U.S. Legal Support, Inc. U.S. Legal Support, Inc. was
9 contacted by the offices of U.S. Legal Support, Inc.
10 Bingham Farms to provide court reporting services for
11 this deposition. The firm will not be taking this
12 deposition under any contract that is prohibited by
13 O.C.G.A. 15-14-37 (a) and (b).

14 U.S. Legal Support, Inc. has an agreement to
15 provide reporting services with U.S. Legal Support, Inc.
16 Bingham Farms, the terms of which are as follows. Any
17 and all special rates and/or services are available to
18 all parties involved in this litigation.

19 Mr. McCallum, would you please raise your right
20 hand.

21 STEVE MCCALLUM,
22 having been first duly sworn, was examined and testified
23 as follows:

24 MR. JOHNSON: Let the record reflect this is the
25 deposition of Special Agent Steve McCallum taken pursuant

1 to notice. It will be used for all purposes permissible
2 under the federal rules of evidence and the rules of
3 civil procedure.

4 EXAMINATION

5 BY MR. JOHNSON:

6 Q. Special Agent McCallum, as they told you right
7 before we started, my name is Ven Johnson. I represent
8 Mr. Blasingame, along with Solomon Radner in my office
9 and Maddie Sinkovich, who are obviously attending by way
10 of the computer and the Zoom as well.

11 Before we get started, just want to the make
12 sure we have a general understanding of the deposition
13 format. I'll take it, you've given a deposition before,
14 sir?

15 A. Not in a civil case like this, no.

16 Q. Okay. Obviously, you're familiar with
17 testifying live in a courtroom setting?

18 A. Correct.

19 Q. Same rules. Just no judge, no jury. So just
20 like you heard me, you swore to tell the truth. I'll be
21 asking questions and then when I'm done, counsel for the
22 city will ask you questions and kind of go on like we
23 would in court, other -- again, other than the -- no
24 judge, no jury. Okay?

25 A. Yes, sir.

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1 Q. Thank you.

2 Special Agent McCallum, who are you employed by?

3 A. Say it again. I'm sorry. We cut out.

4 Q. Who are you employed by?

5 A. Georgia Bureau of Investigation.

6 Q. So if I call it GBI, you'll get it, right?

7 A. Yes, sir.

8 Q. How long have you been sort of working for GBI?

9 A. Approximately five years.

10 Q. And so your title currently is special agent?

11 A. Correct.

12 Q. What's that mean in general?

13 A. It's working as a state investigator, state
14 detective.

15 Q. "State" meaning what?

16 A. We are employed by the State of Georgia.

17 Q. Okay. Now, in Michigan, we have a state police.
18 We call them troopers, of course, but Michigan State
19 Police.

20 A. Yeah.

21 Q. Are you, in fact, the state policing agency
22 for Georgia, sir?

23 A. We are. I mean, some states, they separate it.
24 We have troopers which are on the traffic side of things
25 and the GBI is on the investigation side. Some states

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1 combine that -- one agency does both, so we do not.

2 Q. Thank you.

3 Before working for GBI, where were you employed,
4 sir?

5 A. I did a short term with the state doing
6 insurance investigations and I was employed with Norcross
7 Police Department prior to that.

8 Q. Insurance investigation for -- what was your
9 exact title while you were there?

10 A. I was a special agent there as well.

11 Q. How long did you do that?

12 A. That was approximately two years.

13 Q. And then when you were at Norcross Police
14 Department, is that N-o-r-c-o -- c-r-o-s-s?

15 A. Yes, correct.

16 Q. Georgia, sir?

17 A. Georgia, yes.

18 Q. How long did you work there?

19 A. From -- a little over three years. So I left --
20 yeah, I left the fire department in 2010 and went to
21 Norcross PD.

22 Q. So before becoming -- being with the police
23 department, you were with the fire department at
24 Norcross.

25 A. Actually, Gwinnett County. I was a

1 firefighter-paramedic.

2 Q. In what county?

3 A. Gwinnett County.

4 Q. How long were you with the fire department as
5 well as a paramedic, sir?

6 A. A little over four years.

7 Q. How about before that?

8 A. College, that was it. Yeah.

9 Q. Did you get a four-year degree?

10 A. I did.

11 Q. From where, please, and when?

12 A. Georgia College and State University from 2002
13 to 2006.

14 Q. Degree in?

15 A. Good old criminal justice. Yeah.

16 Q. Should have guessed, but you know.

17 A. Yeah. Yeah.

18 Q. So you -- did you have to get out of college and
19 take -- or go to an academy or -- it looks like you might
20 have gone to the fire academy first?

21 A. Yeah, I did. I went to the fire academy first,
22 yes.

23 Q. And then got your paramedic --

24 A. Got my paramedic as well, yeah.

25 Q. And then from there, went to a policing academy

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1 in order to join Norcross?

2 A. I got POST certified in 2010.

3 Q. When you were working for Norcross Police
4 Department, Special Agent McCallum, what kind of stuff
5 were you doing in particular?

6 A. I was on patrol and then on crime suppression,
7 on their SWAT or SRT team. So we did, say, general
8 investigations and patrol on crime suppression unit,
9 so...

10 Q. Did you -- while you were with Norcross, did you
11 have a Taser?

12 A. I did.

13 Q. All three years you were there?

14 A. Correct.

15 Q. You ever Tase anybody in the back?

16 A. I have not.

17 Q. In terms of your on duty with Norcross, ever use
18 your firearm in the line of duty other than for training?

19 A. Say again.

20 Q. When you were with Norcross PD, had you ever
21 used your firearm for any other purpose --

22 A. I --

23 Q. -- other than for training?

24 A. -- no, I have not.

25 Q. Thank you.

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1 Same thing for GBI. As part of your GBI gear,
2 do you folks carry -- or do you carry a Taser?

3 A. I do.

4 Q. What kind?

5 A. It's a Taser X2.

6 Q. I'll take it, you got your Taser training, then,
7 from GBI after joining them?

8 A. I've had it since I've had a Taser. But yes,
9 they do continual training as well.

10 Q. All right. Have you -- as part of the training,
11 do you -- do you folks at GBI -- to the best of your
12 memory, Special Agent McCallum, are you trained at all
13 with materials with Taser International itself?

14 A. Am I trained with materials from Taser
15 International?

16 Q. Yes, sir.

17 A. I'm not aware of where the stuff is from.

18 Q. Okay. When -- as you've been with the GBI, as
19 part of your duties, have you ever Tased anybody in the
20 back since you've been at GBI?

21 A. No.

22 Q. How about use of your firearm outside of
23 training?

24 A. No.

25 Q. Well, let's see. We're in '21. So you joined

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1 GBI ballpark, Special Agent, about 2016?

2 A. Correct.

3 Q. So when you got involved with the Blasingame
4 investigation October of what -- pardon me -- July of
5 2018, you'd have been with GBI for somewhere around two
6 years.

7 A. That looks about correct.

8 Q. Okay. As part of your duties with GBI, other
9 than this investigation, have you ever investigated any
10 other use of force that involved the Atlanta Police
11 Department?

12 A. Yes.

13 Q. How many times?

14 A. I can't tell you. I'd have to look back at my
15 cases.

16 Q. Can you give me an estimate?

17 A. I cannot.

18 Q. You think it's been more than ten?

19 A. At that point in time three years in, I really
20 can't tell you. It -- I don't see -- I couldn't tell you
21 unless I go back and look.

22 Q. How about now?

23 A. Right now, I still couldn't tell you. We work
24 numerous use of force and shooting investigations for
25 Atlanta Police Department.

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1 Q. Do you know why that is?

2 A. Because they request us to work these
3 investigations.

4 Q. And other than you all obviously are from the
5 same state, is there any overlap in terms of
6 administration and so forth between GBI and Atlanta?

7 A. No.

8 Q. So when you all get involved the way that you
9 did in the Blasingame investigation, I'll take it, you
10 believe it to be an independent investigation, sir.

11 A. Correct.

12 Q. To the best of your knowledge, when you're
13 involved in a use of force investigation like you were in
14 October -- in July -- don't know why I'm saying October
15 today.

16 So let's go with July 2018. To the best of your
17 knowledge as part of your investigation, do you
18 understand it to be along the lines of information that
19 could be used in a criminal prosecution?

20 A. These are criminal investigations that we
21 conduct.

22 Q. Okay. And can you tell me in -- by using that
23 term, "criminal" -- obviously, understanding this is a
24 civil case -- what's the difference? What do you see
25 that the state is in there if you can, please, sir?

1 A. You're asking me why I stated that that's the
2 type of investigation; is that what you're asking me?

3 Q. Yes, sir.

4 A. We don't investigate anything civil with the
5 GBI, so that's why it's a criminal investigation. Not
6 meaning that they -- a crime -- that a crime occurred.

7 Q. Sure.

8 A. Just meaning that that's the type of
9 investigation that we conduct.

10 Q. Okay. To the best of your knowledge, does
11 anybody perform what you understand to be a civil
12 investigation into the use of force for the Atlanta
13 Police Department?

14 A. No. I don't know who conducted the civil
15 investigation.

16 Q. Okay. Thank you.

17 With respect, sir, to this particular
18 investigation, can you tell me how they differ.

19 From the use of force investigations that you've
20 been involved with, with -- into Atlanta Police
21 Department, do you remember you investigating any other
22 use of Taser other than this one?

23 A. I have. I'd have to go back to the dates and
24 see if it was before or after that one. But I've
25 invest- -- I've investigated other Taser use of force

1 incidences.

2 Q. Can you estimate how many before or after
3 just -- that you've done at GBI of Atlanta. Can you tell
4 me how many you believe there to be approximately.

5 A. So not a whole lot because those investigations
6 are not requested on a routine basis, if that makes
7 sense. They -- we do not investigate Taser use of force.

8 Q. Understood.

9 How many that you've done?

10 A. A handful.

11 Q. Five-ish?

12 A. Ish, yes.

13 Q. That's a technical legal term up here in
14 Michigan.

15 A. Yeah.

16 Q. Sorry.

17 A. Five -- approximately five.

18 Q. I -- that was my word, not yours.

19 All right. To the best of your knowledge, if
20 you know, Special Agent, why -- why not investigate all
21 Tasers? Why only some?

22 A. It depends on the department. I'm not going to
23 give my opinion on as to why that is. But we also don't
24 have the means to investigate every use of force at the
25 GBI, so -- or for every use of force incident.

1 Q. Why aren't you going to give your opinion?

2 A. Say again. I -- it's not relevant.

3 Q. You -- okay. And I guess that's -- that's going
4 to be an important factor for us to discuss on this case.

5 When I go through the reports here of GBI'S
6 investigation into the Blasingame matter, it does not
7 appear, for the most part, that I see opinions. Is that
8 by design?

9 A. Correct. We do not have opinions in any of our
10 use of force investigations.

11 Q. And why is that? If you know.

12 A. We're fact-finders. We do -- conduct a thorough
13 investigation of that use of force incident. In these
14 situations, then that investigation's turned over to the
15 D.A.'s Office to make a determination whether or not any
16 crime actually did occur.

17 Q. Okay. Do you know that if Atlanta -- City of
18 Atlanta uses your investigation into this incident as
19 part of their internal affairs investigation?

20 A. I really don't know where that goes. I couldn't
21 attest to exactly what APD does with the investigation.

22 Q. Okay. So in this case as it pertains to your
23 investigation into the Blasingame matter, there are no
24 formal opinions listed by you relative to this matter,
25 correct?

1 A. Correct.

2 Q. And I'll take it, then, relative to your
3 involvement in this federal lawsuit, you will not be
4 issuing any opinions for or against anybody -- party or
5 any person in this matter. Correct?

6 A. Right. Correct.

7 Q. When -- when the call came in, can you tell us
8 who was the person initially in charge of the GBI
9 investigation?

10 A. You mean initially in charge or who basically
11 assigns the cases is what you're asking me, correct?

12 Q. That's a better question than mine, so let me do
13 it again.

14 As it pertains to this investigation
15 specifically, who got the call and how did it get
16 assigned, please? Thank you, sir.

17 A. The normal procedure would be our special agent
18 in charge, which at the time would have been
19 Cynthia Adkins, I believe. At the time, it would have
20 been Cynthia Ad- -- Adkins. Also would have been
21 Rocky Bigham as an assistant special agent in charge or
22 Brian Whidby as an assistant special agent in charge. I
23 could tell you that -- let's me see on this initial
24 request. You know we -- we -- hold on. I can tell you
25 who that was. Sorry.

1 Q. No, you're good. I appreciate you checking.
2 And just let us know if you don't mind, so counsel and I
3 know when you are checking, what you're looking at to
4 refresh your memory, if you would.

5 A. I'm looking right now at the initial request
6 summary. I don't specify in this summary what supervisor
7 contacted me, but it was one of those three supervisors
8 that contacted me to conduct this investigation -- to
9 assign me the case.

10 Q. And the first page of your investigation,
11 that -- it ultimately was assigned to you, sir?

12 A. Correct.

13 Q. Okay. And is the first page -- can you tell
14 me -- obviously, we've gotten documents that were sent to
15 us presumably by you.

16 But is the first document -- that first
17 paragraph, what is -- what is the first paragraph? I
18 need to know that I'm on the first -- same first page as
19 you have.

20 A. All righty. So our reports are organized by
21 exhibits. So what you're seeing in front of you is -- if
22 you accurately navigate the report, you look at summary
23 list for the exhibit which is going to list them in the
24 order I've put them. And any attachments are going to be
25 hyperlinked.

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1 So my first summary in there -- or my first
2 exhibit is going to be titled Initial Request. And to
3 navigate into our report, every investigative act is
4 assigned a summary --

5 Q. Okay?

6 A. -- which is then an exhibit number, so...

7 Q. Okay. The first thing I have, at least Exhibit
8 1, on Tuesday July 10, 2018 at approximately 5:30 p.m.
9 Is that the right document?

10 A. Yes, correct.

11 Q. So in essence, GBI was requested by Atlanta
12 Police Department to conduct investigation into a Taser
13 use of force incident, correct?

14 A. Correct. Yes.

15 Q. And this is your note, obviously, Special Agent
16 Steven McCallum, correct?

17 A. Correct.

18 Q. And APD Officer Jon Grubbs Tased
19 Jerry Blasingame who sustained injuries as a result of
20 the incident is what it says, in essence, right?

21 A. Correct.

22 Q. Thank you. Okay.

23 And the fact of the matter that it's assigned to
24 you, is there any -- is there a rotation? The fact that
25 you got this versus somebody else because of specialty?

1 Is there -- can you help us to understand that at all.

2 A. Yeah, it -- since it was 5:30 p.m., I'm assuming
3 I was on call. We have on-call rotations after hours,
4 basically, who gets assigned a case nights and weekends.
5 During the day -- it's kind of on a rotational basis. I
6 don't schedule the rotation, but the supervisors do,
7 so...

8 Q. Got it.

9 So then you got the call at about 5:30 p.m. that
10 night?

11 A. Yeah.

12 Q. All right. That's when we can start to roll on
13 the investigation, correct?

14 A. Correct.

15 Q. So the next thing that we logically look for,
16 Special Agent McCallum, would be Exhibit 2.

17 A. Correct.

18 Q. You see how quick us guys in Detroit are? Go
19 right to the heart of the matter. Okay.

20 I have -- Exhibit 2 is a three-page document
21 that starts -- at least on that first page, the first
22 paragraph on Tuesday, July 10, 2018 at approximately
23 6:30 p.m. Am I at -- is that the right one?

24 A. Yeah, it should be titled, Case Briefing From
25 Atlanta Police Department Sergeant Aaron Zorn.

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1 Q. Yeah, all of these are entitled the same.
2 Either that first document, just the --

3 A. Yeah.

4 Q. -- Georgia Bureau of Investigation and then
5 investigative summary on my copy.

6 A. Oh, it should say the title. I don't know what
7 printout you're looking at.

8 Q. Okay.

9 A. But I -- that -- but yes, that we're tracking.
10 That's the second report. I don't know why the title's
11 not there.

12 Q. That's good?

13 MR. JOHNSON: Solomon or Maddie, can somebody
14 put at least Exhibit 1, the first page up.

15 MR. RADNER: Is it -- Exhibit 1 is that the big
16 fat one?

17 MR. JOHNSON: Yep.

18 Q. (By Mr. Johnson) In a shocking twist of fate,
19 Special Agent McCallum, the old man doesn't know how to do
20 the share documents. So forgive me that I'm --

21 A. That's fine.

22 MR. JOHNSON: Yeah, that's good.

23 (Whereupon, Plaintiff's Exhibit No. 1 was
24 presented.)

25 Q. (By Mr. Johnson) Can you see the -- we put it

1 up on the screen, I think, for the --

2 A. Yeah.

3 Q. -- Special Agent?

4 A. Yeah, I can see it. I can see it.

5 Q. So the fact that it's not -- doesn't have the
6 title that you talked about, is that the -- okay. Here's
7 a big question. Is that a big deal to you?

8 A. No.

9 Q. All right. Cool.

10 I see handwriting or at least initials below
11 your signature line, HDT and BW. Who's that?

12 A. Those are the supervisors. So we approve
13 reports in the system. They read them, then also approve
14 them.

15 Q. Okay.

16 MR. JOHNSON: Let's go to Exhibit 2, please, the
17 following three pages.

18 (Whereupon, Plaintiff's Exhibit No. 2 was
19 presented.)

20 Q. (By Mr. Johnson) Okay. I'm showing you what --
21 what is Exhibit 2 now and I just -- I was just starting
22 to read that first page. Again, despite the -- maybe not
23 having the same topic, if you will, there -- there at the
24 top of the page, if you will.

25 A. Yes.

1 Q. Still the same thing?

2 A. It's the same report, yeah. When we generate a
3 report in our case management system, this is how you
4 view it. I'm just simply viewing the case in our --
5 directly in our management system. That's all.

6 Q. Okay. Cool. Thank you.

7 So obviously, after you got the initial call --
8 it looks like 6:30 p.m. or so the same day of the
9 incident, Special Agent, July 10, 2018, you ultimately
10 went to APD and met with Sergeant Zorn.

11 A. Correct. Right.

12 Q. I take it, you understood Sergeant Zorn, now
13 Lieutenant Zorn, to be a supervisor of Officer Grubbs?

14 A. I assume.

15 Q. Okay. So further on -- still Exhibit 2 bottom
16 of page 1, on Tuesday, July 10 at 2:00 p.m. -- oh, this
17 is the information, then, that Zorn is giving you about
18 the incident itself?

19 A. Correct.

20 Q. Did he tell you how he got this information?

21 A. No.

22 Q. All right. As a seasoned investigator, I take
23 it, your assumption is he spoke with the officers
24 involved?

25 A. Correct.

1 Q. Can he do that? Even though you're conducting a
2 criminal -- a potential criminal investigation, can you
3 use that information?

4 A. Yes. And we have to know what happened.

5 Q. Yes, sir. Okay.

6 So at least in terms of the incident -- and this
7 is the -- pretty much the third -- or the largest
8 paragraph. Let me get right to the incident, please.
9 I'll use your words.

10 "Grubs and Shelley observed a black male, later
11 identified as Blasingame, soliciting at the on-ramp which
12 was a controlled access highway. When Blasingame saw the
13 officers, he immediately fled on foot up I, dash, 20
14 westbound."

15 "Grubbs pursued Blasingame on foot. Grubbs
16 jumped a guardrail and followed Blasingame onto a path in
17 the woods between the on-ramps. Grubbs deployed his
18 Taser one time on the path in the woods striking
19 Blasingame in the back."

20 "The path was steep and thick with vegetation.
21 Blasingame landed head first onto a cement pad at the end
22 of the path. Blasingame was transported to Grady
23 Hospital where he was in critical condition."

24 Did I at least read that portion of the
25 paragraph correctly, sir?

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1 A. You did.

2 Q. Had you ever been to this scene before your
3 investigation, Special Agent?

4 A. No, I had not.

5 Q. Obviously, you're probably generally familiar
6 with the roadways. But were you familiar with anything
7 to do with the -- I'll call it the topography, the way in
8 which the land existed between these two ramps?

9 A. No, it's a -- it's a very intertwined -- that
10 specific area is a very intertwined location with a
11 multitude of ramps there. So no, I wasn't familiar with
12 that area at all.

13 Q. Okay. Again -- so this is what Zorn is giving
14 you on the night of the incident.

15 A. Correct.

16 Q. Where he says, "Grubbs and Shelley" observed my
17 client soliciting on the ramp. Obviously, information he
18 told you.

19 A. Essentially, yeah.

20 Q. He did not tell you that only one of the
21 officers thought my client -- or saw my client soliciting
22 money and the other did not?

23 A. He -- what is in my report is what essentially
24 he told me.

25 Q. Right.

1 So if the evidence in this case is contrary to
2 that, that's not what he told you.

3 A. Correct.

4 Q. He apparently told you that the Tasing occurred
5 after Grubbs jumped a guardrail and followed my client
6 onto the path in the woods between the ramps.

7 A. That's right, yes.

8 Q. He did not tell you that Grubbs shot my client
9 in the back with a Taser before he went up and over the
10 guardrail, did he?

11 A. No.

12 Q. He told you that my client landed head first
13 onto the cement pad after being struck with a Taser,
14 correct?

15 A. Correct.

16 Q. At no time did he tell you that they suspected
17 that my client somehow tripped and fell on his own
18 without being Tased.

19 A. Say that again now.

20 Q. At no time did Zorn tell you that they suspected
21 that my client somehow tripped and fell on his own
22 without, in essence, falling because he was being Tased.

23 A. He did not tell me that.

24 Q. At this point, at no time did Grubbs tell you
25 anything about the use for -- of the Taser other than my

1 client was fleeing.

2 A. Grubbs didn't interview on this investigation.

3 Q. Good point. My bad. Let me do it again.

4 At this time, Zorn did not tell you anything
5 about why my client was Tased, as apparently told to him
6 by Shelley and Grubbs, other than my client was fleeing.

7 A. No. Yeah, this is a general case briefing
8 letting me know --

9 Q. Yes, sir.

10 A. -- generally what happened. Correct.

11 Q. If somebody swung at an officer or tried to
12 assault an officer that led to a Tasing, certainly, it's
13 highly important information to share with an
14 investigator like you. Agreed?

15 A. I would assume, yes.

16 Q. Nowhere did Grubbs -- and I said Grubbs again.
17 Sorry.

18 Nowhere at this time in your report does it
19 indicate that Zorn told you that Grubbs deployed his
20 Taser because he was worried about my client entering
21 traffic, correct?

22 A. He did not tell me that.

23 Q. Bottom of page 2, top of page -- or excuse me.

24 Bottom of page 1, top of page 2, Shelley was not
25 a witness -- witness to the incident; he remained in the

1 patrol vehicle?

2 A. Yes.

3 Q. Obviously became a witness to the -- after the
4 incident events, correct?

5 A. Correct.

6 Q. All right. On page 2, top first full paragraph,
7 "Grubbs and Shelley activated their body cameras.
8 Grubbs' body camera was not in buffering mode and only
9 recorded events after the incident."

10 So what does that tell you about his body camera
11 if it's not in buffering mode at the time of the event?

12 A. I really don't know. I don't -- I'm not
13 familiar with their system generally. Basically, his --
14 that's the explanation I was getting as to why his did
15 not record the event. I couldn't explain what mode that
16 is.

17 Q. Well, Grubbs -- if the testimony in this case is
18 Grubbs would actually have to hit a switch in order to
19 make his camera go into buffering mode because he had
20 taken it off -- or turned it off earlier, do you have any
21 information to the contrary?

22 A. I -- so you broke up a little bit on that. What
23 was that?

24 Q. Happy to do it again, sir.

25 At least at this point, Zorn did not give you

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1 any information as to why Grubbs had his camera off and
2 not in buffering mode.

3 A. Correct. I don't know why that was.

4 Q. Do you folks have body cameras?

5 A. We do not.

6 Q. So I guess what I'm -- what I'm wondering,
7 when Zorn's telling you that Grubbs and Shelley activated
8 their body cameras, did you -- did he tell you when they
9 activated them?

10 A. He didn't. He did not. If I didn't say it in
11 here, I don't recall that he specifically gave me a time
12 as to when they were activated.

13 Q. Body cameras certainly could be important
14 information for you, can they not, sir?

15 A. Correct.

16 Q. I mean, if they're on, you can see whatever
17 there is to see by the way of the camera location of the
18 incident; correct?

19 A. Correct.

20 Q. If they're not, then we have to rely on folks
21 who were involved in the incident and/or otherwise
22 eyewitnesses.

23 A. And evidence. Correct.

24 Q. Physical evidence, too, of course. Yes, sir.

25 You agree with that?

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1 A. Yes, sir.

2 Q. "Officer Ryan Steven," S-t-e-v-e-n, "was in
3 possession of Grubbs' Taser and it was in the process of
4 downloading."

5 I'll take it, that's an Atlanta Police
6 Department officer?

7 A. Correct.

8 Q. "The crime scene was processed by Zorn and
9 Wilder," W-i-l-d-e-r.

10 Do you know who Wilder is?

11 A. No, I do not.

12 Officer Steven was in possession of Grubbs' Taser and was
13 in the process of downloading the video and Taser data.

14 Q. "Wilder took photographs and took measurements
15 at the crime scene. No evidence was obtained at the
16 crime scene."

17 And that -- I'm -- I'm a little lost on that.
18 Photographs and measurements are certainly evidence. But
19 I'll take it, you're talking about physical evidence
20 there at the scene.

21 A. Excuse me. That -- yeah, that's what I was --
22 that's what I meant to say, physical evidence. Correct.

23 Q. Cool. Okay.

24 A. Yeah.

25 Q. Have you ever seen measurements from the scene?

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1 A. I would assume I have. I'd have to go back and
2 look at this report. This is many years ago.

3 Q. Yes, sir.

4 A. Do you want me to go look at that?

5 Q. I will probably ask you that a little later on.

6 A. Yeah, that's what I figured.

7 Q. So by "no evidence was obtained at the crime
8 scene," in other words, anything that may have been on
9 the ground or in the area that folks would have assumed
10 or believed to be somehow related to this incident,
11 nothing was apparently kept or filed.

12 A. Correct.

13 Q. Did Zorn ever tell you about a dollar bill that
14 was seen on the ground that they thought might be related
15 to this incident?

16 A. I don't recall.

17 Q. Okay. If there's a dollar bill in the crime
18 scene where the -- some officers involved may believe
19 that that was a dollar bill that my client got from a
20 motorist. Typically speaking, isn't that something that
21 you'd want to see where it was located at the crime scene
22 and have it documented, Special Agent McCallum?

23 A. Yes.

24 Q. That's something that -- if Zorn saw and
25 believed that's what it was, the dollar bill, that's

1 something that you would expect him to record and
2 otherwise turn over to you.

3 A. Correct.

4 Q. Apparently, at this time at least, he didn't do
5 it, according to your report.

6 A. If it's not in the report, no, I don't recall.

7 Q. Okay. Thank you.

8 Obviously, you confirmed, a few more paragraphs
9 down, my client did not have any weapons on him at that
10 time?

11 A. That's correct.

12 Q. And you requested from Zorn the Taser video and
13 the body camera video obviously, correct?

14 A. Correct.

15 Q. From both so you can see whatever there was to
16 be seen, if anything.

17 A. Right.

18 Q. But obviously, you can't add some stuff that
19 you're not made aware of --

20 A. Correct.

21 Q. -- right?

22 So page 3 of the same exhibit, please.

23 (Whereupon, page 3 of Plaintiff's Exhibit

24 No. 2 was presented.)

25 Q. (By Mr. Johnson) "Taser inventory" means what,

1 please, Special Agent McCallum?

2 A. Basically, it's the way of saying what Taser was
3 assigned to that officer. There's a document most people
4 sign, training, things like that just to show what serial
5 number Taser it was assigned to.

6 Q. Thank you.

7 Taser download documents obviously, correct?

8 A. Correct.

9 Q. The incident report, is that a report that's
10 ultimately done by Officer Grubbs?

11 A. Well, yeah. It's basically the APD or most
12 police departments, they create their own incident
13 report. It states date and time, things like that.
14 Yeah, that's the Atlanta -- that's their side of it. So
15 I request that as well just so I have that information.

16 Q. Yes, sir.

17 And the CAD detail is what, C-A-D detail?

18 A. Yeah. So I didn't -- that's Computer Aided
19 Dispatch detail, so it's times on their dispatch as far
20 as when things happen exactly.

21 Q. Okay. And radio traffic, is that audio?

22 A. That's audio, correct.

23 Q. Okay. Use of force policies and procedures of
24 Atlanta police, obviously, you got that from APD?

25 A. Correct.

1 Q. And why did you want that?

2 A. We get that on all cases. We just get that on
3 all cases, to be honest, just to see what department --
4 what their policies and procedures are for that
5 particular use of force, whether it could be less lethal
6 or deadly use of force.

7 Q. Okay. Obviously, a copy of Grubbs's training
8 file?

9 A. Uh-huh.

10 Q. Yes?

11 Review of Grubbs' internal affairs and personnel
12 file? Why do you do that?

13 A. That's mainly going to be so we can see and I
14 know everything about that officer prior to any media or
15 any other individual getting that information. I'm not
16 blind-sided by anything in particular.

17 Q. Crime scene report and pictures taken by 7334,
18 Wilder?

19 A. Correct.

20 Q. What's a crime scene report.

21 A. Say again.

22 Q. What is a crime -- what's this crime scene
23 report mean?

24 A. Well, at that time, I was just wanting
25 everything that they had in pertaining to their

1 processing of that crime scene when it occurred -- right
2 after it occurred.

3 Q. And obviously, you asked for a copy of all
4 charges and for the citation.

5 A. Right.

6 Q. Did they discuss with you -- did Zorn -- excuse
7 me -- discuss with you at that time potentially other
8 citations or charges?

9 A. I don't recall.

10 Q. If -- in a situation like this, if my client was
11 suspected of trying to get money from motorists -- some
12 people call it pandering and others call it begging,
13 whatever -- and therefore, could also charge with running
14 away from a police officer.

15 If there was a swing or a punch or an elbow or
16 any physical contact that was attempted by my client
17 against the officer, wouldn't you agree to expect that
18 information to be shared with you as well at this point
19 as the investigating officer, sir?

20 A. Say that one more -- sure. This is a general
21 brief, so whatever he knew at that time. I'm not aware
22 when he became aware of different things at different
23 times. I spoke to him this time.

24 Q. Yes, sir.

25 So again, if there was an attempted assault by

1 my client of this officer in any way physically --
2 obviously, that's assault and battery -- you would expect
3 to be told that information from the beginning.

4 A. If he was aware at that time.

5 Q. Yes, sir.

6 A. If he knew at that time.

7 Q. Okay. Fair enough.

8 If Zorn knew, you expected him to tell you,
9 right?

10 A. Correct. Now, this is a -- this is not a
11 transcription of our conversation --

12 Q. Yes, sir.

13 A. -- what happened. So I'm not testifying as to
14 the exact -- we do not record my conversation with that
15 sergeant, so I cannot recall everything that was stated
16 exactly at that point in time.

17 Q. I know.

18 But to be fair, Special Agent McCallum, he talks
19 to you about my client swinging on a cop, that's
20 something you're not just going to leave out of your
21 report, are you?

22 A. I would put it in my report.

23 Q. Thank you, sir.

24 Exhibit 3 is four pages.

25 MR. JOHNSON: If someone can put that up for us.

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1 Thank you, sir.

2 (Whereupon, Plaintiff's Exhibit No. 3 was
3 presented.)

4 Q. (By Mr. Johnson) It starts out with, "On
5 Tuesday, July 10, 2018 at approximately 7:07 p.m.,
6 Special Agent McCallum located APD."

7 And now you were interviewing Keith Shelley,
8 correct, sir?

9 A. Correct.

10 Q. That interview was audio recorded, correct?

11 A. Correct.

12 Q. And in a part of the file that we -- I -- we
13 have that, so thank you for that as well.

14 And then I'll take it, what you do is -- we can
15 see in this report is you give a general overview of what
16 you believe to be the most important things that you got
17 from Shelley, true?

18 A. Right. It's not a transcription. That's
19 essentially what he stated. I'm not testifying to what
20 he stated. The audio recording's there as well.

21 Q. Got it.

22 So what we can do -- and by the way what we have
23 done -- is you can listen to the recording. We can see
24 your overview. And if the recording says something
25 different than the overview, you go with the recording,

1 right?

2 A. Correct.

3 Q. I'm already on page 2, the middle. I'm not
4 going to read everything to you, I promise.

5 A. All right.

6 Q. Middle paragraph, "Shelley described the
7 individual as a black male approximately 50 years of
8 age" -- pardon me -- "50 years old with gray hair, later
9 identified as Blasingame." Correct?

10 A. You're on -- yes, I'm just looking for that
11 paragraph.

12 Q. Yeah. It's the middle paragraph, last sentence.

13 MR. RADNER: I just highlighted it.

14 Q. (By Mr. Johnson) The second to last sentence.

15 A. I see it. Yes, correct.

16 Q. So obviously, you learned that -- or at least
17 from Shelley, he did not see the actual Taser event,
18 correct?

19 A. Correct.

20 Q. I'm on page 3.

21 MR. JOHNSON: I apologize, folks. Give me one
22 quick minute. Let me run to the restroom. I apologize.
23 We'll take a break, please, a quick break.

24 (Whereupon, a recess was taken.)

25 MR. JOHNSON: Everybody all ready?

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1 THE WITNESS: Okay.

2 MR. JOHNSON: Okay.

3 THE COURT REPORTER: Yes.

4 MS. NAIR: Yes.

5 MR. JOHNSON: I apologize, Special Agent.

6 Go back to page 2, if you would, please.

7 (Whereupon, page 2 of Plaintiff's Exhibit

8 No. 3 was presented.)

9 Q. (By Mr. Johnson) And in the second full
10 paragraph where Shelley was telling you apparently that
11 my client just received some money from a vehicle in the
12 roadway -- and you're welcome to read the rest if you
13 need to for my question.

14 As you're talking to Shelley, you --

15 (Whereupon, plaintiff's attorneys had a
16 discussion off the record.)

17 Q. (By Mr. Johnson) I take it, Shelley's -- you
18 understood Shelley to be telling you that my client was
19 on the shoulder of the roadway, correct?

20 A. Yes.

21 Q. Okay. Over time --

22 A. I don't -- let me do -- the person was two lanes
23 over on the left side of the roadway. Correct.

24 Q. Okay.

25 A. Okay.

1 Q. And then Shelley tells you he recei- -- he
2 had -- the individual, Mr. Blasingame, re- -- just
3 received some money from a vehicle in the roadway, is
4 what it says, right?

5 A. Correct.

6 Q. Shelley was about to get onto the bridge of I-75
7 which is all the way up -- because these two roadways
8 split off eventually there, correct?

9 Okay. Do you understand it?

10 A. Yes.

11 Q. So Shelley's in the right lane and then he
12 drives into the gore which -- you learn something new
13 every day, Special Agent. I didn't know what a gore was.

14 But that's in --

15 A. Yes.

16 Q. -- in between the two split-offs, if you will.
17 That cement is just not a traveled --

18 A. Correct.

19 Q. -- pavement.

20 A. It's called a gore.

21 Q. Okay. All right. Then the third paragraph,
22 Shelley's now telling you ultimately about where Grubbs
23 get out of the car and starts to pursue my client,
24 correct?

25 A. Correct.

1 Q. All right. "Blasingame looked directly at
2 Shelley and immediately took off running up I-20
3 westbound."

4 In other words, he's still on that shoulder
5 area, but he's running up the road to get away from the
6 police vehicle. Is that what you understood?

7 MS. NAIR: I apologize. I'm going to object and
8 ask that counsel not testify in his questions.

9 MR. JOHNSON: Okay. I don't testify, ma'am. I
10 ask questions. So you're -- got you. And I guess it's
11 form.

12 Q. (By Mr. Johnson) Go ahead if you understand the
13 question.

14 A. I'm not going to -- I don't -- I don't really
15 feel comfortable testifying to what he should be
16 testifying to. I'm not going to say what he meant, what
17 he thought, what he assumed, or anything like that.
18 So --

19 Q. Okay.

20 A. -- you know, my report stands alone. In other
21 words, I can't testify to what -- you know, if -- that's
22 something you have to ask him or he can testify to.

23 Q. Obviously, I have and I want you to assume that
24 he testified exactly what I just said, that my client ran
25 up the side of the roadway away toward the back of their

1 car -- away from the car.

2 So was that consistent or inconsistent with what
3 he told you?

4 A. He ran up the way. That's what I -- that's how
5 I assume -- that's what I assume.

6 Q. So that would be consistent with what I just
7 laid out to you was his testimony in this case, correct?

8 A. Correct.

9 Q. Okay. At no time did Shelley tell you in this
10 interview about my client's actions.

11 At no time, did he tell you that he was running
12 in or around the roadway, did he?

13 A. I don't recall.

14 Q. All right. It does doesn't say that in your
15 report, does it?

16 A. It does not say it in my summary.

17 Q. So after talking about running up I-20
18 westbound, Shelley gets back into his car with Grubbs
19 pursuing on foot, is what Shelley told you, correct?

20 A. Essentially correct.

21 Q. Yeah.

22 And then ultimately, that's when he lost sight
23 of my client and Grubbs, correct?

24 A. Correct.

25 Q. So again, even looking at the rest of that

1 paragraph, absolutely no observations were given to you
2 at that time by Shelley that my client was actually
3 running into traffic. Agreed?

4 A. I don't recall. It's not stated in the summary.
5 I'd have to go back and listen to the audio for his exact
6 statements.

7 Q. Okay. But it's not anywhere in this summary, is
8 it?

9 A. It's not in my summary.

10 Q. Thank you, sir.

11 Going back to page 3 -- one, two, three -- four
12 paragraphs down. "Grubbs told Shelley something about a
13 Taser and that Blasingame fell and hit his head," is what
14 your report says, correct?

15 A. That's what it says.

16 Q. So when you say it's "Grubbs told Shelley
17 something about a Taser," did you ask Shelley what
18 specifically Grubbs said?

19 A. You'd have to go listen to the audio. This is
20 essentially a brief synopsis of the interview.

21 Q. Yes, sir.

22 A. You'd have to listen to the audio. So I
23 can't -- I don't recall.

24 Q. I have.

25 So the fact of the matter is you would want to

1 know everything that Grubbs told Shelley about what led
2 to the actual Tasing itself. Agreed?

3 A. Yes.

4 Q. Like, if there was some act that my client
5 allegedly did that caused or contributed to the decision
6 to Tasing him, that's something that you want to hear
7 from Shelley if Grubbs told him that.

8 A. Correct.

9 Q. Okay. So Grubbs told Shelley something about a
10 Taser and that Blasingame fell and hit his head. And
11 again, no information coming from Shelley at that time
12 that my client fell for any other reason other than he
13 was Tased, correct?

14 A. I don't recall. The purpose of the summary is
15 not for a transcription of the interview. It's for a
16 guide, for a direction so you can go listen to the audio.
17 I was -- I'm not -- I don't recall the details. I did
18 not listen to the audio of everything on this case file
19 prior to this deposition. I do not recall word-for-word
20 what Shelley told me.

21 Q. Okay.

22 A. My report does not indicate that right now.

23 Q. Thank you.

24 If Shelley testified under oath in this case
25 that it was his information directly from Grubbs that my

1 client fell after being Tased and that's when he hit his
2 head on the cement thing, that would be consistent with
3 what Shelley told you that day.

4 A. That sounds consistent, yes.

5 Q. "After the incident, Grubbs and Shelley drove to
6 APD Zone 5. Grubbs told Shelley something about
7 Blasingame reaching back at him, but Shelley could not
8 remember exactly what Grubbs said after the incident."

9 Did I read that right?

10 A. You did.

11 Q. Okay. So again, other than listening to the
12 tape, which I have, that's all that your record has about
13 what Grubbs told Shelley about, quote, reaching back at
14 him. Agreed?

15 A. Agreed.

16 Q. If Grubbs -- if Shelley would have told you
17 Grubbs told me Blasingame swung at me, you would have
18 written down exactly what Shelley told you, right?

19 A. No, this is not a transcription. This is
20 essentially stated. So this is not a transcription of
21 that interview, so --

22 Q. Yes.

23 A. -- it's not word-for-word.

24 Q. If Shelley would have told you my client took a
25 swing at him and tried to hit him in the face, if Shelley

1 would have told you that, that's important information to
2 you and you would put it in your report. Agreed?

3 A. I agree.

4 Q. And even though --

5 A. I'm not trying to play games here, but that's
6 not in the audio. That's something -- you listen to the
7 audio, he did not tell me that. I mean, I can go back
8 and listen myself, but -- I'm assuming you're asking me
9 if that's what I would normally put in a summary?

10 Q. You -- if Shelley told you Grubbs told me he
11 took a swing at me, that would end up in your summary.

12 A. Okay. I would assume. But if you've listened
13 to the audio, I mean, I'm asking you, then, is that what
14 he's stated?

15 Q. Well, unfortunately, I'm not the witness.

16 And the answer is, "What he said was something
17 about reaching back at him, but Shelley couldn't remember
18 exactly what Grubbs said."

19 So my question to you --

20 A. That's what I wrote.

21 Q. Okay. That's what you wrote and that's what he
22 said.

23 So my question is: Did you find --

24 A. Yeah.

25 Q. -- that to be a little odd?

1 A. No.

2 Q. What does "reaching back" mean?

3 A. It could mean a lot of things. This is a highly
4 stressful situation. He's dealing with traffic on an
5 intersection. I'm not going to tell you what's going on
6 in his mind. I've interviewed a lot of officers about
7 incidences and what they perceive at the time and what
8 they focus on may be differently than you think. So I'm
9 not about to go into what I believe is odd or not odd. I
10 simply asked them a question.

11 Q. Right.

12 And you wrote down what he told you.

13 A. Correct.

14 Q. Okay. So you didn't try to come up with any
15 conclusions as to what "reaching back" at him meant;
16 that's the word you used and that's what you wrote down.

17 A. Correct.

18 Q. You also wrote down that Shelley apparently
19 could not remember exactly what Grubbs said.

20 A. At that time.

21 Q. Right.

22 Even though it was the same day.

23 A. That's the same day.

24 Q. Blasingame was obviously unconscious. Did not
25 say anything after the incident. Blasingame did not say

1 anything on the street before he ran, what your report
2 says, correct? That's what Shelley apparently told you.

3 A. That's what he told me.

4 Q. Nothing in your report, at least through this
5 point in time, says anything about Shelley hearing Grubbs
6 give my client any type of orders. Agreed?

7 A. Agreed.

8 Q. Nothing in this report thus far says anything
9 about Grubbs giving my client a warning before firing the
10 Taser. Agreed?

11 A. Agreed.

12 MR. JOHNSON: Page 4, please.

13 (Whereupon, page 4 of Plaintiff's Exhibit
14 No. 3 was presented.)

15 Q. (By Mr. Johnson) Second paragraph about four
16 lines down. "Shelley activated his body camera during
17 the incident"?

18 A. Yes.

19 Q. "Patrol vehicle did not have a dash camera,"
20 correct? Is what it says.

21 "And Grubbs was wearing a body camera" is what
22 all of these things Shelley is telling you.

23 A. That's what he's told me, yes.

24 Q. "Shelley drew a diagram of where he first saw
25 Blasingame, the patrol vehicle's location, and the

1 direction Blasingame ran. See attached."

2 MR. JOHNSON: And can I put that up, please, in
3 the diagram.

4 MR. RADNER: Yep.

5 (Whereupon, Plaintiff's Exhibit

6 No. 2 was again presented.)

7 Q. (By Mr. Johnson) Just want to make sure it's
8 the -- the one that I think it is, the one we're talking
9 about is the one that you got from Shelley that day,
10 please, sir. We marked it in this deposition as
11 Exhibit 2.

12 A. Yeah, it appears to be the same document.

13 Q. Thank you, sir.

14 (Whereupon, Plaintiff's Exhibit No. 3 was
15 presented.)

16 MR. JOHNSON: You can take it. Thank you.

17 (Whereupon, Plaintiff's Exhibit No. 3 was
18 again presented.)

19 Q. (By Mr. Johnson) Exhibit 3, Special Agent
20 McCallum. In one -- and it looks like just information
21 about Officer Shelley. But you tell me, please.

22 A. You broke up a little bit there. You said?

23 Q. Exhibit 3, it looks like it's information about
24 Shelley. But what -- how would you describe this?

25 A. Oh, hold on. Let me see what you got here.

1 Q. Thank you, sir.

2 A. What are you -- I'm not sure what you're
3 referencing. I have a -- the only two exhibits attached
4 to that are the diagram and the audio.

5 Q. Okay. I'm showing you this next document. It
6 says Exhibit 3 on it right now.

7 A. Oh. Yes. Oh, that's just ID data. Sorry. All
8 our exhibits are summaries. So that's Summary No. 3.
9 That's just telling you who I spoke with on that
10 interview.

11 Q. That's just -- obviously, just pertaining to
12 Shelley.

13 A. ID data, yes. So if we talk to multiple people
14 or -- you know, during that incident, all their ID data
15 there is -right underneath that narrative.

16 Q. Got it. Thank you, sir.

17 MR. JOHNSON: Exhibit 4, it looks like
18 two-pages, if someone will put up for you. Thank you.

19 (Whereupon, Plaintiff's Exhibit No. 4 was
20 presented.)

21 THE WITNESS: Okay.

22 Q. (By Mr. Johnson) On Tuesday, July 10, 2018, at
23 7:38 p.m. And it looks like you're trying to talk to
24 Grubbs and Grubbs did not want to make any statements at
25 that time, correct?

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1 A. Yes, that's correct.

2 Q. Relatively standard, sir?

3 A. That is standard -- relatively standard, yes.

4 Q. So obviously, Grubbs doesn't have to give a
5 statement if he doesn't want to at least at this point.

6 A. That is correct.

7 Q. And I'll take it, you let Grubbs know that you
8 were there on behalf of GBI, in the unlikely event he
9 didn't already know, as conducting a criminal
10 investigation into this.

11 A. Right.

12 Q. Now, in essence, he then says he doesn't want to
13 make any statement.

14 And then you ultimately apparently saw the union
15 attorney Sandra Michaels there that night, did you not?

16 A. I -- that's what the report states, yes.

17 Q. Do you know a Ms. Michaels?

18 A. Do I know her? I do not know her personally.

19 Q. Okay. You know her professionally -- I mean,
20 you -- if she was in the room, you'd know that that's
21 Sandra Michaels or no?

22 A. No, I wouldn't -- not -- not right now, I
23 wouldn't know.

24 Q. Fair enough. Thank you.

25 So tell me how it works once the officer

1 declines to give an interview to you, then how do you
2 ultimately obtain any information from the officer in
3 that kind of a scenario?

4 A. Just like any other criminal investigation, we
5 do not.

6 Q. Okay. You would talk to the officer's attorney.

7 A. I would -- oh, yeah. I would discuss with the
8 attorney. If they decided they want to speak at a
9 later -- or make a statement at a later point in time, I
10 would then take that statement.

11 Q. Is that statement in a situation like that
12 considered a Garrity statement?

13 A. No, it -- it's not really Garrity, no. Garrity
14 is going to be when you're -- the departments and they're
15 asking you questions about administratively that
16 investigation. This is not a Garrity issue.

17 Q. Got it.

18 Garrity would be like the internal affairs if
19 they wanted to talk to him, that would be that type of
20 thing.

21 A. Correct. That's a Garrity issue, yeah.

22 Q. Thank you.

23 A. Or you'd be under Garrity at that point in time.

24 Q. Yes, sir. Thank you.

25 A. It's not a Garrity.

1 Q. Understood.

2 Okay. You obviously -- I have one, two,
3 three -- four paragraphs down the last sentence. "Grubbs
4 deployed his Taser via probes, one five-second cycle," is
5 what your report says, correct?

6 A. Correct. Yes.

7 Q. And is that information you would have gotten
8 from the download or how would you know for the one
9 five-second cycle?

10 A. That is, I believe, what this is -- here, hold
11 on one second.

12 Q. Sure.

13 A. At that point, I believe Grubbs told me that
14 when I was collecting his Taser.

15 Q. Okay. So you took photos of Grubbs' Taser?

16 A. Yeah.

17 Q. The battery, camera were not in the Taser
18 because they were in the process of downloading, correct?

19 A. Correct.

20 Q. There was one unspent cartridge in the Taser, so
21 that would --

22 A. Yeah.

23 Q. -- that would support what he told you that he
24 just viewed --

25 A. Yeah.

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1 Q. -- the one five-second cycle, correct?

2 A. Correct.

3 MR. JOHNSON: On page 2, please.

4 Q. (By Mr. Johnson) So it looks like you took a
5 photograph of Officer Grubbs, his Taser, and his Glock.

6 And the reason for taking a photograph of the
7 officer that was involved in this incident is what?

8 A. Just numerous reasons. That way, any police
9 encounter, I can say what they were wearing at the time
10 as far as what identified them and things of that nature.

11 Q. Okay.

12 A. Anything I may have missed, I'll have a photo of
13 his -- on that person.

14 Q. And obviously, if he had any visible signs of
15 injury, tearing of the clothing, blood dripping, anything
16 like that, that would be important --

17 A. Yeah.

18 Q. -- an issue you'd want to document as well,
19 right?

20 A. Correct. It would be.

21 Q. And here there -- here there was none of that,
22 correct?

23 A. There was none, no.

24 Q. Okay. So that's the picture that you took of
25 Officer Grubbs that night?

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1 A. That is.

2 Q. Thank you.

3 MR. JOHNSON: Next picture, please.

4 (Whereupon, another photograph in
5 Plaintiff's Exhibit No. 4 was presented.)

6 Q. (By Mr. Johnson) Another picture of him maybe
7 just turning a little sideways?

8 A. Yes.

9 Q. And then from behind?

10 A. Correct, yes.

11 Q. Okay. Turning around to the side again.

12 MR. JOHNSON: Go ahead.

13 MS. NAIR: Mr. Johnson, are these labeled as
14 exhibits?

15 MR. JOHNSON: These are -- these are actually in
16 the report, these are photos 0806, 0807, 0808, 0809, and
17 then the Taser is 0810. And that's obviously dot JPG.
18 These are the attachments if you clip that hyperlink in
19 that report.

20 But for the record, what we're going to do is
21 we're going to print off this entire report and -- with
22 the actual photos after the each of the particular
23 sections, so that someone reading it old school like this
24 old guy could see them, please. So that's what we'll do.

25 MS. NAIR: Thank you. I just want to be clear

1 for the record.

2 MR. JOHNSON: Yes, ma'am. I appreciate the
3 clarification.

4 MR. RADNER: They're all going to be jointly
5 Exhibit 1 in --

6 MR. JOHNSON: Yeah.

7 MR. RADNER: -- Exhibit 1, his report.

8 Q. (By Mr. Johnson) So it looks like we have the
9 four photos of Officer Grubbs.

10 MR. JOHNSON: Solomon, can you go to the next
11 photo.

12 (Whereupon, another photograph in
13 Plaintiff's Exhibit No. 4 was presented.)

14 Q. (By Mr. Johnson) That's the -- we're now on the
15 photo of his -- Officer Grubbs' Taser, correct?

16 A. Correct.

17 MR. JOHNSON: Second photo of the Taser.

18 (Whereupon, another photograph in
19 Plaintiff's Exhibit No. 4 was presented.)

20 Q. (By Mr. Johnson) You're now looking at the
21 cartridge -- is that the cartridges in?

22 A. It's the one unspent and unspent -- unspent
23 cartridge, correct.

24 MR. JOHNSON: That's three photos. Go ahead,
25 please.

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1 (Whereupon, another photograph in
2 Plaintiff's Exhibit No. 4 was presented.)

3 Q. (By Mr. Johnson) That's the serial number,
4 Photo 4, of the Taser, correct?

5 A. Correct.

6 Q. And then obviously, this is relative to the
7 firearm that we don't -- know played no role in this
8 event. Agreed?

9 A. That is correct. Agreed.

10 Q. So that's a Photo 1 of the firearm.

11 MR. JOHNSON: Go ahead and just go through each
12 firearm so I can count the number, please.

13 (Whereupon, photographs in
14 Plaintiff's Exhibit No. 4 were presented.)

15 Q. (By Mr. Johnson) That's two, three -- so three
16 of the firearm, correct, sir?

17 A. Correct.

18 MR. JOHNSON: Sorry. Solomon just said he
19 somehow skipped over one more, sir.

20 That's okay. Take your time. Let's just be
21 sure what's up there so we -- everybody knows what we're
22 talking about.

23 (Whereupon, another photograph in
24 Plaintiff's Exhibit No. 4 was presented.)

25 Q. (By Mr. Johnson) Oh, that's the serial number

1 and so forth on the side, correct?

2 A. Correct.

3 Q. All right.

4 MR. JOHNSON: There must be another one. Okay.
5 Go for it. There we go. It looks like one -- I think I
6 lost count. I think that's five.

7 MR. RADNER: Yeah.

8 MR. JOHNSON: Right. Any more?

9 (Whereupon, another photograph in
10 Plaintiff's Exhibit No. 4 was presented.)

11 MR. JOHNSON: Is that six?

12 MR. RADNER: That was the sixth, yeah.

13 Q. (By Mr. Johnson) And that's -- the sixth,
14 that's the clips, right?

15 A. That's the magazine, yeah.

16 Q. Magazine. Thank you. Okay.

17 A. Yes, sir.

18 Q. Okay. So total of six?

19 A. It could be six. That's what I have.

20 Q. Thank you, sir.

21 MR. RADNER: That would be six.

22 (Whereupon, Plaintiff's Exhibit No. 5 was
23 presented.)

24 Q. (By Mr. Johnson) Exhibit 5 of your report, sir,
25 documents that on that same day, July 10, 2018, at 8:45

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1 p.m. -- I just -- I don't know what I just said.

2 It looks like you went to the scene to take some
3 photographs.

4 A. Correct.

5 Q. Photographs of measurements were taken in
6 reference summary 665649. That will be another summary,
7 I'm guessing, another exhibit that we'll come up to as we
8 go through the report?

9 A. Correct.

10 Q. Thank you.

11 Obviously, you documented no evidence was
12 obtained by APD, correct?

13 A. Correct.

14 Q. Thank you.

15 "Sergeant McCallum took multiple photographs at
16 the scene of -- at the incident location. See attached.
17 There was a reddish stain on a cement pad near an
18 electrical box at the bottom of the path in the woods
19 that led to the I-75 on-ramp."

20 MR. JOHNSON: Go ahead show that, please.

21 (Whereupon, an unidentified exhibit was
22 presented.)

23 Q. (By Mr. Johnson) That's part of the report.
24 This is attachment.

25 MR. JOHNSON: Let's go. Got it?

1 Q. (By Mr. Johnson) So we're clicking on the first
2 attachment of the photographs of the incident location
3 and it says it's empty.

4 MR. JOHNSON: So we'll go to the second one,
5 please.

6 (Whereupon, plaintiff's attorneys
7 conferred off the record.)

8 MR. RADNER: There's nothing to click here.

9 (Whereupon, an unidentified exhibit was
10 presented.)

11 Q. (By Mr. Johnson) So when we -- when we look at
12 the photos -- the attachments where it says "the scene,"
13 that's -- this is what we're seeing, name, size, date,
14 modified with nothing in it.

15 A. I have 31 photos in my report. I'm not sure why
16 you don't have them.

17 Q. Okay.

18 MR. RADNER: I believe we have them somewhere
19 else, but this particular link is -- leads to nothing.

20 MR. JOHNSON: So we can work out that later.

21 THE WITNESS: You can -- the hyperlink sometimes
22 can be funny. I don't know how you're viewing it. But
23 it should hyperlink. I have 31 photos that are attached
24 to mine on this one.

25 MR. JOHNSON: Got it. Thank you.

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1 Okay. Let's go back to the report, please, on
2 page 1 of 2.

3 (Whereupon, an unidentified exhibit was
4 presented.)

5 Q. (By Mr. Johnson) "Special Agent McCallum
6 located one AFID on the path in the woods near the
7 guardrail at the top of the path represented by Placard
8 No. 1."

9 What is the AFID?

10 A. Technically, it's -- I believe it's anti -- like
11 an anti-felon identification. Basically, it's a --
12 small tags that come out of the Taser cartridge itself
13 when it is deployed. And they have the serial number to
14 that cartridge on there.

15 Q. Okay. So you marked it with, like, a Yellow
16 Placard No. 1.

17 A. That's what I did, correct.

18 Q. I'm trying to better understand. You may not be
19 able to help me without looking at the photos, so I'm
20 pulling photos of what I can find about the placard,
21 Special Agent McCallum.

22 But in terms of this location where you saw
23 this -- where you saw this cartridge, if you will --

24 A. Yes.

25 Q. -- from the Taser, can you help me at all in

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1 terms of the words that you used of how close it was to
2 the guardrail?

3 A. So I'm -- I'm looking at it myself here real
4 quick. I'm just opening these images.

5 Q. Thank you.

6 A. It takes a little time on my computer on my end,
7 so...

8 MR. RADNER: I can go through them.

9 THE WITNESS: I'll have to go through them one
10 by one.

11 (Whereupon, the witness reviewed
12 photographs.)

13 THE WITNESS: What was your question again?

14 Q. (By Mr. Johnson) I'm trying to better
15 understand where the -- this cartridge was that you were
16 describing located at the Placard No. 1. So I'm going to
17 read it from page 1 of 2 in your report.

18 A. Uh-huh.

19 Q. "Special Agent McCallum located one AFID on the
20 path in the woods near the guardrail at the top of the
21 path represented by Placard No. 1."

22 A. Correct. I'm looking through -- my computer's
23 just taking a minute. I got a picture of the AFID. I'm
24 just trying to find your -- as far as exactly where that
25 was on the path.

1 It was hard to take photographs of that because
2 it was so thick. So I have the photograph of where it
3 was in relation to the bottom of the path. I don't think
4 you can physically see the placard from the top of the
5 path through the foliage. I have a photograph. I just
6 can't see the placard in it because of all the trees.

7 Q. Okay. I -- and I want to understand what you
8 just said in terms of -- when you say "couldn't see the
9 placard," you mean -- not the No. 1?

10 A. Yeah, that's what I'm looking for. I can see it
11 in this photograph from the bottom, but you're asking me
12 to look at the placard from the top of the guardrail,
13 correct?

14 Q. Nope. I was just trying to find where it's
15 located.

16 A. Oh. Okay. It's -- okay. Then the photograph
17 right here (indicating) does show it. I did not take a
18 specific measurement because that AFID did come out all
19 over the place with the Taser. But it's -- looks like
20 it's kind of above -- you know, there's a grade. It's
21 hard to tell in pictures the grade, but it's -- looks
22 like it's in the path in the woods.

23 Q. Got it. Okay.

24 So in other words, if we were -- just for the
25 reference of both gentlemen at some point -- in other

1 words, my client and Officer Grubbs -- it's not on the
2 roadway. You would have to go up and over the guardrail,
3 go down the path, and then that's the area where you saw
4 this AFID, A-F-I-D?

5 A. Correct. Yeah, it's in the woods in the path.
6 That's correct.

7 Q. Okay. And tell me about, if you would, when you
8 see that it's located where it's located? In other
9 words, is it -- that is on the path.

10 MR. JOHNSON: I -- can I take a quick break,
11 please. My son is in the E.R. and I just want to make
12 sure he's okay.

13 Thank you.

14 (Whereupon, a recess was taken.)

15 MR. JOHNSON: Sorry everybody.

16 (Whereupon, a discussion was held off the
17 record.)

18 MR. JOHNSON: All right. Let's go back on.

19 Q. (By Mr. Johnson) In your photos that you took,
20 do you have photos of the yellow No. 1 and 2 placard,
21 Special Agent McCallum?

22 A. I believe I do. I was just looking at one of
23 the No. 1 placard.

24 Q. Okay. We're having some confusion on our end,
25 so I apologize. I just want to make sure that I have

1 what you have so I know what you did versus somebody
2 else. Thank you.

3 A. Got you.

4 Q. Okay. The fact that you see this AFID, A-F-I-D,
5 in the location that it is, does that suggest to you or
6 not that the deployment of the Taser, if you will, likely
7 took place in the area -- in other words, on the pathway
8 as opposed to on the shoulder of the road area?

9 A. It's possible --

10 Q. Can you tell me if --

11 A. -- it happened on the pathway.

12 Q. Go ahead.

13 A. I mean, there are numerous. I mean, that --
14 they're very, very tiny as you see in the photograph. So
15 they could be on someone's clothes and fell off.

16 But it's the general vicinity to say that it was
17 in that area, so...

18 Q. Got it.

19 And if -- I know we're not talking firearm here.
20 But if we had a casing and a firearm, we'd have a similar
21 type discussion. It might give me some information. It
22 might not.

23 A. Yeah, for sure. Same thing.

24 Q. Same thing?

25 A. Right.

1 Q. Okay. Got it. Thanks.

2 And then, "Special Agent McCallum located the
3 Taser wires on the path in the woods. The Taser wires
4 began next to the AFID and were represented by Placard
5 No. 2."

6 A. Correct.

7 Q. Okay. Likewise, you found those in the woods as
8 well, correct, sir?

9 A. Correct.

10 Q. All right. Did you ever ask Sergeant Zorn or
11 anybody from APD why they didn't collect this stuff?

12 A. No, I don't recall that I asked them.

13 Q. Okay. Per the APD crime scene report, "The
14 distance between the reddish stains on the ground and the
15 guardrail was 23 feet, 9 inches." Did I read that right?

16 A. Yes. Yes, sir.

17 Q. Okay. And forgive me, but the guardrail that
18 apparently both gentlemen went over.

19 A. Yes, correct. At the time.

20 Q. Thank you.

21 How long are the Taser wires? If you know.

22 A. Well, it depends on the cartridge. So 20 -- it
23 could be 25 feet. They come in different length
24 cartridges.

25 Q. All right. Are you familiar with what this one

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1 came with?

2 A. I don't recall what length that was.

3 Q. Okay. Next paragraph, same page, page 1.

4 You're just documenting, obviously, serial
5 number and stuff that you see on the AFID, sir?

6 A. Correct.

7 Q. So at least on page 2 on the attachment, you've
8 told us that you had 31 pictures of the scene?

9 A. Correct.

10 Q. And then it says, "Photograph of AFID." That's
11 a closeup?

12 A. That is, yes.

13 Q. Just one or more?

14 A. I'm looking -- yeah, just one photograph. That
15 was after I -- that -- basically, when I collected it, I
16 put it on another object so you could see -- or attempt
17 to see the serial number. It's really small on them --

18 Q. Okay.

19 A. -- on the AFID.

20 Q. And then you obviously marked that Taser AFID as
21 a -- with having a particular individual evidence number.

22 A. I did.

23 Q. Thank you, sir. All right.

24 The next page of the report goes to July 11th,
25 2018 at 2:00 p.m. It looks like you went and checked in

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1 on my client.

2 A. I did.

3 Q. Thank you for doing that.

4 He was at Grady Hospital, correct?

5 A. Correct.

6 Q. And when you say my client was "in custody at
7 APD," what does that mean as it relates to the hospital?

8 A. And so it happens -- when you're in the hospital
9 but you're still under arrest, you're -- basically,
10 you're in custody there. But they -- you're not at the
11 jail. You're seeking medical attention. There's an
12 officer there at the door or near the door.

13 Q. And you may not know this, but I -- if -- my
14 client was obviously in custody, then, when he was Tased
15 and injured, correct, as you understand the evidence?

16 A. You mean when he was Tased at -- basically,
17 directly after the incident, he was in custody? Yes,
18 that's how I interpret it. Correct.

19 Q. So in other words, he was injured, if you will,
20 while he was in custody.

21 A. (Whereupon, the witness nods head
22 affirmatively.)

23 MS. NAIR: Object to form.

24 Q. (By Mr. Johnson) Special Agent?

25 A. Say again.

1 Q. My client was then -- as you understand it as
2 part of your investigation, he was injured while he was
3 in custody of the Atlanta Police Department?

4 MS. NAIR: Objection as to form.

5 Q. (By Mr. Johnson) Could you answer, please.

6 A. I thought it was an objection. I can't hear.
7 So should I answer this question?

8 MS. NAIR: You may answer if you know.

9 THE WITNESS: Okay. I -- actually, I'm not --
10 I'm not understanding the question. We'll leave it at
11 that. You're asking if he was in custody?

12 Q. (By Mr. Johnson) Right. When he was --

13 A. When you -- Tased?

14 Q. Yeah, when he was Tased, he was in custody and
15 was injured while he was in custody --

16 A. That's how I interpret the situation.

17 Q. Thank you.

18 So when you went and saw him, he was still in
19 the ICU, sir, the intensive care unit.

20 A. That's correct.

21 Q. And did you actually get to see him, sir?

22 A. I did.

23 Q. He was on a ventilator according to your report.

24 A. Yes.

25 Q. All right. You -- it says you spoke with his

1 doctor who advised you there's no change in his condition
2 since his arrival.

3 Do you know who his doctor was that you spoke
4 with?

5 A. I don't. If I didn't document it there, I don't
6 recall who that was.

7 Q. Okay. Your report states, quote, Blasingame had
8 blunt force trauma to the left side of his face and
9 potentially cervical spine fractures.

10 Did I read that right?

11 A. Correct.

12 Q. I'll take it, you got that information from my
13 client's physician.

14 A. At the time, yeah.

15 Q. It says that you took pictures and they're
16 attached. None of the family members had visited the
17 hospital. The hospital did not have a next of kin
18 information.

19 Which would make it pretty hard for folks to --
20 to be there, right?

21 A. Yeah.

22 MR. JOHNSON: And then we have photographs,
23 please, the attachments.

24 THE WITNESS: Yeah, it should be -- let me tell
25 you how many here. I think three photographs, I believe.

1 (Whereupon, an unidentified photograph was
2 presented.)

3 Q. (By Mr. Johnson) This is a picture of my
4 client's head and face area. This looks like there's
5 still blood on his face and even on the pillow.

6 Is that what you saw?

7 A. That is correct.

8 (Whereupon, an unidentified photograph was
9 presented.)

10 Q. (By Mr. Johnson) This is another picture pretty
11 much, but a full front-on of his face, sir, correct?

12 A. Correct. Correct.

13 (Whereupon, an unidentified photograph was
14 presented.)

15 Q. (By Mr. Johnson) Last photo, third, it looks
16 like the left side of his face.

17 A. Correct.

18 Q. Thank you.

19 Back to your report. On July 11, 2018 at
20 3:00 p.m., it looks like you went back to APD to receive
21 the body camera and Taser video.

22 A. Yes.

23 Q. Do you see the CD from Sergeant Kramer that
24 contained video from Grubbs's body camera, Shelley's body
25 camera, and video from Grubbs' Taser, correct?

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1 A. That's correct.

2 Q. And did you -- you attach those as well?

3 A. Yeah, they're in -- they're into the case file.

4 Sometimes attachments to the actual case management
5 system with CDs and different things like that is hard.

6 So yes, they were attached to the case file -- the
7 hard -- you know, physical case file.

8 Q. Yes, sir.

9 Did you review those at the time?

10 A. I did.

11 Q. And was there anything in particular of note to
12 you as the investigator?

13 A. I don't have an opinion on the video. It stands
14 for itself.

15 Q. Did you write any notes at that time about your
16 observations of the video?

17 A. No, I did not.

18 Q. Did Kramer at all -- did Sergeant Kramer advise
19 you of any type of internal affairs investigation that
20 was going on at this time?

21 A. I don't recall.

22 Q. The fact that Grubbs's body camera was not on at
23 the time of the incident, was that at all important for
24 your investigation?

25 A. I documented that.

1 Q. Okay. Later in the report or did I do something
2 already?

3 A. I stated that it was in buffering -- well, he
4 told me at the case briefing is why I didn't report the
5 incident. So that's all I stated. And that was -- the
6 video was -- like the sergeant stated at the case
7 briefing, it did not record the actual incident. Just
8 afterwards.

9 Q. Okay. So at least from what Grubbs told you, it
10 was in buffering mode, correct?

11 A. Not Grubbs, but the -- Sergeant Zorn. Yeah,
12 that's, I believe, when he stated buffering mode. And
13 I'm not familiar with their particular software programs
14 or cameras, so...

15 Q. That's where I guess -- so you looked at Grubbs
16 body camera that day. You had nothing of the incident
17 itself, obviously.

18 A. That's correct.

19 Q. All right. And whether that meant it was
20 completely off versus in buffering mode, I'll take it,
21 you don't know.

22 A. I don't know exactly why, yeah, the reasons are
23 it didn't capture it.

24 Q. All right. Did you hear Grubbs in his body
25 camera, as well as on Shelley's body camera, talk to EMS

1 folks about why he Tased my client?

2 A. I don't recall what was stated and I did not
3 review that video today.

4 Q. Okay.

5 A. It was quite sometime ago. I'd have to go back
6 and listen to that or review the video.

7 Q. Okay. Would you agree, as an experienced
8 investigator, that when being asked right there at the
9 scene as to why he Tased my client, that would certainly
10 be some of the best evidence that we would have as to why
11 he Tased my client?

12 A. I'm not -- I'm not understanding if that's a
13 statement or a question. We have that on video. I mean,
14 we have that on audio. So if you have a question about
15 that, it's going to be on -- it's going to be captured on
16 his body camera and Shelley's body camera.

17 Q. Yes, sir.

18 I'm talking about you as an experienced
19 investigator. Hearing the words out of somebody's mouth
20 before the authorities come in, before the lawyers get
21 there and are involved, hearing what they say about an
22 incident is certainly -- can be some of the most
23 important information that we have about why somebody did
24 something. Agreed?

25 A. It's information that we have on this case.

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1 Q. But again, as an experienced investigator, the
2 timing of it's pretty important --

3 A. I don't have anything -- I don't have an
4 opinion.

5 Q. Okay. You don't have an opinion as to whether
6 statements made initially before investigators and
7 lawyers are often considered to be more reliable than
8 those after?

9 A. All statements are documented in the case in
10 this case file on this case, so...

11 Q. Okay. So my --

12 A. So I can --

13 Q. -- question is did you document -- did you quote
14 anywhere in the report about what those recordings
15 revealed of Grubbs' --

16 A. Yes.

17 Q. -- answer to the question?

18 A. Yes. The recordings were attached to my case
19 file, so they're in the case file for your review.

20 Q. Okay. Now, I'm -- I'm not -- now I'm talking
21 about you summarized your interview with Shelley.

22 A. Yes.

23 Q. Is there a summary of what you heard Grubbs say
24 on those videos?

25 A. No, I didn't summarize that.

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1 Q. All right.

2 A. I did not.

3 Q. Thank you.

4 MR. JOHNSON: Next report, please.

5 (Whereupon, Plaintiff's Exhibit No. 8 was
6 presented.)

7 MR. RADNER: Exhibit 8.

8 Q. (By Mr. Johnson) Exhibit 8. Same date July 11,
9 3:12 p.m. It looks like you're getting the Taser from
10 Kramer -- Sergeant Kramer. Pardon me, sir.

11 A. That's correct.

12 Q. "The battery -- and the battery, slash, camera
13 was put back into the Taser to ensure that all data was
14 retained and all items were placed in the same evidence
15 container." Correct?

16 A. That's correct.

17 Q. And therefore, the recording that was on the
18 Taser, you -- that was part of the information we have
19 already just talked about, correct?

20 A. Right.

21 Q. I talked about the body cameras, but you also
22 saw and heard --

23 A. The -- yeah, the Taser attachment used, correct?

24 Q. Got it. Okay. Thank you.

25 So if it was part of the attachments, then the

1 property records -- APD property receipt that's just for
2 the Taser itself?

3 A. That's correct.

4 Q. All right.

5 (Whereupon, Plaintiff's Exhibit No. 9 was
6 presented.)

7 Q. (By Mr. Johnson) Exhibit 9, it's like the next
8 day July 12, 2018 at 12:20. It looks like you got
9 documents from Sergeant Zorn. You received a copy of
10 APD's CAD, C-A-D, related to the incident, a copy of your
11 arrest warrants and citations issued to Blasingame, and a
12 copy of APD's use of force and conducted electrical
13 weapon policy. And you personally attached those, true?

14 A. That's correct.

15 Q. All right. So let's go to the first attachment.
16 It says, "Other CAD-related to incident 181911254."

17 That's the call for service. That -- that's
18 kind of the printout and so forth of the dispatch-related
19 thing, sir?

20 A. That's correct.

21 MR. JOHNSON: Go ahead.

22 MR. RADNER: Okay. That's the --

23 MR. JOHNSON: Is that the -- was that all the
24 attachments there?

25 MR. RADNER: Yeah.

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1 Q. (By Mr. Johnson) That was -- everything that
2 was attached is what we showed you real quick, I think --

3 A. All right.

4 Q. -- Special Agent McCallum.

5 A. For that one, yeah. Then there's the other
6 book -- policies and procedures are attached and the
7 citations and the arrest warrant.

8 MR. JOHNSON: Go to the attachments, the second
9 one. Thank you.

10 (Whereupon, attachments from Plaintiff's
11 Exhibit No. 8 were presented.)

12 Q. (By Mr. Johnson) All right. So this is the --
13 the first SOP.3042 conducted electric weapon policy,
14 correct?

15 A. Correct.

16 Q. It says, "Signed 12/14/17" and it was effective
17 December 15, 2017, correct?

18 A. Yes.

19 Q. And I'll take it, to the best of your knowledge,
20 was this the CEW policy that was in effect at the time of
21 this incident on July 10, 2018?

22 A. To the best of my knowledge, yes.

23 Q. Thank you.

24 MR. JOHNSON: All the way down, please, Solomon.

25 Q. (By Mr. Johnson) I think I can see. It says

1 "out of seven pages," but we're going to have to scroll
2 all the way down.

3 MR. RADNER: All the way down?

4 MR. JOHNSON: Please, to the seventh page to
5 make sure. Okay. Go ahead. Is there anything after
6 that?

7 Q. (By Mr. Johnson) It looks like the next policy
8 that's there is 3010, use of force effective date
9 10/30/13?

10 A. Yes. Correct.

11 Q. Same question. To the best of your knowledge,
12 was this review of -- pardon me.

13 Was this use of force in effect at the time of
14 the incident, 7/10/18, to the best of your knowledge?

15 A. Yes, it was.

16 (Whereupon, plaintiff's attorneys
17 conferred off the record.)

18 MR. JOHNSON: Okay. It looks like again it's
19 seven pages, but we'll go to the bottom.

20 MR. RADNER: There's 7 of 7.

21 MR. JOHNSON: Okay.

22 MR. RADNER: And that's it.

23 MR. JOHNSON: Okay.

24 Q. (By Mr. Johnson) It looks like that's the two
25 you got at that time?

1 A. That's correct.

2 Q. Thank you.

3 MR. JOHNSON: And then we're going to go to the
4 last attachment, which is the APD citations and arrest
5 warrants, please.

6 Q. (By Mr. Johnson) The first one is, of course,
7 the affidavit for arrest, bottom left -- or excuse me,
8 not bottom left.

9 But there's the signature of Officer Shelley and
10 this is for the pedestrian soliciting rides or business,
11 correct, sir?

12 A. That's correct.

13 MR. JOHNSON: Put it -- go down, Solomon. Thank
14 you. Keep on going, please. Go ahead. Keep on going
15 down.

16 Q. (By Mr. Johnson) It looks like the next
17 affidavit for arrest is for the willful obstruction of
18 law enforcement officers?

19 A. That's correct.

20 Q. Thank you.

21 MR. JOHNSON: Go ahead and go down.

22 Q. (By Mr. Johnson) Then the next looks like a
23 handwritten, like, ticket, citation number -- uniform
24 traffic citation summons and accusation 5340149?

25 A. Correct.

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1 Q. That's for the pedestrian solicit on roadways,
2 is what it says, correct? It's --

3 MR. JOHNSON: Go down, Solomon. Thank you.

4 Q. (By Mr. Johnson) The next one, citation, is
5 5339976 for obstruction?

6 A. Right.

7 Q. "Did flee from officer on foot." Both, of
8 course, from July 10, 2018.

9 A. Correct.

10 Q. I want you to assume that on the bottom of those
11 two citations is a signature. One of the signatures is
12 Officer Shelley and neither he nor Officer Grubbs believe
13 that the other signature on the second citation belongs
14 to them.

15 Do you have any idea who completed these
16 citations?

17 A. Actually, at this point in time, I don't. I'd
18 have to go back and ask APD.

19 Q. Okay. Thank you.

20 (Whereupon, plaintiff's attorneys
21 conferred off the record.)

22 (Whereupon, Plaintiff's Exhibit No. 10 was
23 presented.)

24 Q. (By Mr. Johnson) Next is Exhibit 10. It looks
25 like July 12 still, 12:20. It looks like you took the

1 Taser battery camera from Sergeant Zorn?

2 A. Correct.

3 Q. Marked it as -- obviously, as an exhibit or in
4 the property room, right?

5 A. This summary actually was by Josh Ellis. Just
6 to let you know, this is his.

7 Q. Oh. I apologize.

8 A. Yeah, not a problem. Just letting you know
9 that's -- we can still go over it anyway.

10 Q. Thank you, sir.

11 How -- how do you know that? We're not -- I
12 missed that somehow.

13 A. Where does it say on here? Just let me see on
14 your printout the way you're viewing it.

15 Q. Because on the bottom of this, the second --

16 A. Okay. The -- yeah, on the case agent. It's
17 just the way I'm viewing it in the system and it's the
18 way y'all have received -- the way you're viewing this in
19 summary form, I guess you don't see the details of each
20 specific one. Which, if you go back to the thumb drive
21 or the data that was given you, there's a different way
22 you can look in there.

23 But anyways, yeah, that's what case management
24 is stating. I remember this as well, so...

25 Q. Tell me again the name. I apologize.

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1 A. Josh Ellis, last name is E-l-l-i-s.

2 Q. Okay. So it looks like he got the Taser battery
3 camera.

4 A. Uh-huh.

5 Q. The Taser was previously collected so now you're
6 just getting the rest of it.

7 A. That's correct.

8 Q. "McCallum previously received a video from APD
9 OPS, Officer Profe- -- or Office of Professional
10 Services."

11 Which is internal affairs basically, right?

12 A. That's correct.

13 Q. All right. "The body -- or battery camera was
14 placed back into the Taser to ensure that all the
15 data" -- okay.

16 This is pretty much what I think your report the
17 day before -- or the day of -- the previous report says
18 you did as well.

19 A. Yeah, it's similar.

20 Q. Okay.

21 A. Yeah, I'm -- you can read here. It was just
22 they inadvertently activated that remaining cartridge
23 seeing if the Taser was -- you can read the rest of it
24 right there. That's why this summary was generated.

25 Q. Okay. Where does this say that? I just -- I

1 apologize to you.

2 A. It's the second paragraph. So he wanted to
3 ensure that the internal clock of the Taser had not been
4 reset and he could then conduct his spark testing so the
5 Taser functioned as designed. "While performing the
6 spark test S.A. Ellis inadvertently activated the
7 remaining cartridge." And he gave the serial number to
8 that cartridge.

9 Q. Okay.

10 A. So we're just documenting -- that now that
11 cartridge is spent, but we're documenting as to why.
12 That was an accidental inadvertent deployment of that
13 during a spark test.

14 Q. Got it. So that's -- it's nowhere in Exhibit
15 10. But Exhibit 11 I think it talks about that. But --

16 A. I'm sorry about that. I may be --

17 Q. No, you're good. It's the same date. It's on
18 there.

19 A. No, that's it. That's it. That's what we're
20 talking about.

21 Q. Okay.

22 A. I may have skipped one --

23 Q. You're --

24 A. -- on you.

25 Q. -- you're all good. Thank you, sir.

1 But it also says now on the attachment to
2 Exhibit 11 "other Taser log."

3 MR. JOHNSON: So let's go to that attachment,
4 please.

5 THE WITNESS: I got you.

6 (Whereupon, Plaintiff's Exhibit No. 11 was
7 presented.)

8 Q. (By Mr. Johnson) This is a Taser -- it says,
9 "Evidence, slash, sync, Taser information." It looks
10 like just a printout, right? From -- this is from
11 Grubbs's Taser?

12 A. That's correct.

13 MR. JOHNSON: All right. I need a -- I'm going
14 to print a copy of that real quick just so that I can
15 read it, please. So let's go off the record for a quick
16 minute, please.

17 MS. NAIR: Let's take a five-minute break --

18 MR. JOHNSON: Thank you.

19 MS. NAIR: -- and come back at twelve o'clock.

20 (Whereupon, a recess was taken.)

21 MR. JOHNSON: Let me know when you're ready,
22 please.

23 THE WITNESS: I'm back. Sorry.

24 MR. JOHNSON: Solomon, can you put on the Taser
25 log up.

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1 MR. RADNER: One second.

2 MR. JOHNSON: I'm going to put up -- or
3 actually, I'm not. Solomon will. Thank you.

4 (Whereupon, Plaintiff's Exhibit No. 11 was
5 again presented.)

6 Q. (By Mr. Johnson) Special Agent, the Taser
7 log -- and I'm going to ask you to look at page 73 of 81.

8 A. All right.

9 MR. RADNER: My main concern is --

10 MR. JOHNSON: You're okay.

11 Q. (By Mr. Johnson) And just to kind of go over
12 the Taser log, is once -- once print out literally
13 probably from wherever the Taser was put into operation
14 and it prints everything out every time it was used and
15 so forth, right?

16 A. Yeah, those are -- those are smart tests and
17 things like that. But that's correct.

18 Q. Yes, sir.

19 (Whereupon, plaintiff's attorneys
20 conferred off the record.)

21 Q. (By Mr. Johnson) So on 73 toward the bottom of
22 the page, if you look in the far left column --

23 (Whereupon, plaintiff's attorneys
24 conferred off the record.)

25 Q. (By Mr. Johnson) Look at 2175 then you go over

1 to the next right -- next column. That's -- looks like
2 July 9, 2018, correct?

3 A. Correct.

4 Q. And I'm -- we know this was on July 10, so now
5 I'm going to slide down to the next box 2176. That's 10
6 July 2018 and it looks like it's at double zero 1428.

7 So military time, that would be midnight, right?

8 A. Say again.

9 Q. Midnight, double zero?

10 A. Oh, yes. Correct. On that the first one there
11 the 10th, yeah.

12 Q. Okay.

13 A. That's correct.

14 Q. And then, of course, the next line down, the
15 2177 that's still July 10. That's -- same thing at
16 midnight. So there he's obviously arming it and making
17 it safe, right?

18 A. That's correct.

19 Q. Next line down, 2178. All those look like
20 they're right around midnight. Including 22179, all
21 around midnight, right?

22 A. Correct.

23 Q. Okay. Then 2180, that looks like it gets us to
24 the 2:38:12 p.m. time frame. Agreed?

25 A. Agreed.

1 Q. All right. So clearly the Taser went at 2:38,
2 at least according to that timer. And I'll take it -- do
3 you have any idea as to the accuracy of the local time
4 and so forth of this, sir?

5 A. I don't. That's what the -- my computer just
6 froze. I'm sorry. That's -- I believe Josh Ellis -- and
7 that's why he turned on the Taser, was to verify the
8 time. I don't --

9 Q. Okay. The --

10 A. -- I don't believe -- detective, but he said he
11 verified it, so my assumption is it's relatively
12 accurate.

13 Q. Okay. So at approximately 2:38 p.m. and 12
14 seconds, that's when apparently the Taser was armed.

15 A. Correct.

16 Q. Turn the page onto -- the next page is page 74.
17 At 2:38 p.m. and 12 seconds, trigger was deployed for
18 duration of five seconds according to that document.

19 A. Correct.

20 Q. So that's poss- -- probably our incident,
21 correct?

22 A. Yeah, that's what I was about to look at. That
23 is -- yes, that's our incident.

24 Q. Okay. You mentioned before about the
25 five-second duration and this document proves that,

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1 right, sir?

2 A. That's correct.

3 Q. Got it.

4 Then everything else after that obviously being
5 after the incident until you all took over the Taser.

6 A. That's correct.

7 Q. Thank you, sir. Okay.

8 And then the next attachment on Exhibit 11 says
9 "Video spark test."

10 And is that the incident -- the inadvertent
11 incident from the other agent?

12 A. That's -- that's my -- yes, that's what I
13 assume. I'm kind of having some technical difficulties.
14 This -- the only thing functioning right now is the Zoom.
15 Let me just get back into the race real quick.

16 Q. Yes, sir.

17 (Whereupon, there was a brief pause in the
18 proceedings.)

19 THE WITNESS: All right.

20 Q. (By Mr. Johnson) Yes, we're looking for it,
21 too. Sorry.

22 A. No problem.

23 (Whereupon, plaintiff's attorneys
24 conferred off the record.)

25 THE WITNESS: That's in reference to the other

1 summary that Josh Ellis did.

2 Q. (By Mr. Johnson) So it looks like the video --
3 it looks like -- I see a carpet.

4 A. That's -- that's just our carpet over here.

5 Q. Okay. Got it.

6 That was accidental or you did that just to test
7 it or what?

8 A. That's not the first time that's happened.
9 That's accidental. So the new -- oh, we don't get into
10 why. But yeah, they spark-tested it. He was doing a
11 check to verify the time. Instead of a spark test, he
12 deployed the Taser.

13 Q. Okay. Glad it wasn't on me.

14 MR. JOHNSON: All right. Let's go to
15 Exhibit 12, please.

16 (Whereupon, Plaintiff's Exhibit No. 12 was
17 presented.)

18 Q. (By Mr. Johnson) This looks again like -- so
19 July 10, 2018. Let's see. Oh, okay.

20 This document looks like a lot similar to one of
21 the first documents that we reviewed. Can you help me
22 understand what this is?

23 A. And you were looking at this one right here
24 which is on?

25 Q. December 12. Yes, sir.

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1 A. Let me...

2 Q. And at the bottom, it does say Special Agent in
3 Charge Assistant Brian Whidby, W-h --

4 A. Oh.

5 Q. -- i-d-b-y.

6 A. No, yeah. This is an executive synopsis.
7 Sorry. This is -- this was -- that's the supervisor over
8 this case. He wrote an executive synopsis on the case.
9 It is a very short synopsis of the investigation.

10 Q. Okay. It looks pretty similar to what you wrote
11 way back when on the day -- on the first day of.

12 A. It is. It's very similar. It's -- I would say
13 this one -- this type summary is more for administrative
14 purposes.

15 Q. Okay.

16 (Whereupon, Plaintiff's Exhibit No. 13 was
17 presented.)

18 Q. (By Mr. Johnson) Exhibit 13 then goes to
19 July 16 at 3:15 --

20 A. Yeah.

21 Q. -- p.m. You contacted Jeff Miller director of
22 certification and training division peace officer
23 standards.

24 On that -- you're probably just reviewing
25 Officer Grubbs's certification process and so forth?

1 A. That's correct. His POST standing, Police
2 Officer Standard and Training certification standing.

3 Q. And they all checked out; he was fully trained
4 and ready to roll.

5 A. They did.

6 (Whereupon, Plaintiff's Exhibit No. 14 was
7 presented.)

8 Q. (By Mr. Johnson) Exhibit 14, July 17, 2018.
9 You got a phone call from Wendy Blasingame, Jerry's
10 sister.

11 A. Correct.

12 Q. Wendy told you she had not seen Jerry in
13 approximately 20 years. You briefly explained the
14 incident, told her that Jerry was at Grady Hospital in
15 intensive care and that she would check on Jerry at the
16 hospital.

17 A. That's correct.

18 Q. It looks like later on that day, you checked
19 back in with her and she gave you an update on his
20 condition?

21 A. Correct.

22 Q. It looks like it -- at least she didn't see him
23 because he was in custody.

24 A. That's correct.

25 Q. At least the information she had, he was now

1 conscious, ambulatory, and talking.

2 A. That's what she told me.

3 Q. July 19, 11:30, you went to the hospital and you
4 interviewed Jerry Blasingame?

5 A. That's correct. Based on what she told me.

6 Q. Yes, sir.

7 And then you find, when he got there, that he
8 was unconscious and on a respirator.

9 A. Correct.

10 Q. Kind of hard to interview somebody in that
11 condition.

12 A. It is.

13 Q. And then you spoke to the doctor saying the
14 condition had never changed. So apparently perhaps sis
15 did not have the correct information the day before.

16 A. Yeah. That's what it looked like.

17 Q. So he was still in critical condition
18 unconscious and on a respirator, at least when you
19 checked that day, sir.

20 A. Yes.

21 (Whereupon, Plaintiff's Exhibit No. 15 was
22 presented.)

23 Q. (By Mr. Johnson) Okay. Exhibit 15 is July 17,
24 12:20. It looks you're that -- you're looking at
25 Grubbs's internal affairs file, right?

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1 A. Yes.

2 Q. And you go through each one of them?

3 A. Yeah, I do. I review their -- or I go through
4 the file, his internal affairs file.

5 Q. Okay. Did you put in your report everything
6 that was there?

7 A. At that time, yeah, everything that was in his
8 internal affairs file.

9 Q. Thank you.

10 (Whereupon, Plaintiff's Exhibit No. 16 was
11 presented.)

12 Q. (By Mr. Johnson) Exhibit 16, still July 17, two
13 o'clock. It looks like you're looking for the crime
14 scene's report from supervisor Lashantise,
15 L-a-s-h-a-n-t-i-s-e, Porter, P as in Paul, o-r-t-e-r.

16 A. That's correct.

17 Q. You got the report and photographs from Ervin,
18 E-r-v-i-n, Wilder -- that's another name we've seen from
19 APD before, correct?

20 A. Correct.

21 Q. You said that, "On the day of incident, 7/10/18
22 at 3:29 p.m., Wilder took numerous photographs of the
23 crime scene, took a measurement from the beginning of the
24 path until the reddish stain in the bottom of the path."

25 That's the 23 feet, 9 inches that we've talked

1 about, right?

2 A. That's correct.

3 Q. All right. And then you have those attached.

4 MR. JOHNSON: If you can get that. Solomon?

5 (Whereupon, plaintiff's attorneys

6 conferred off the record.)

7 (Whereupon, Plaintiff's Exhibit No. 16

8 was presented.)

9 Q. (By Mr. Johnson) So the first attachment are
10 just the crime scene photographs that were taken by the
11 APD?

12 A. Correct.

13 It looks like I've got 30 photographs there, I
14 believe.

15 Q. Okay. So from your perspective, there should be
16 31 photographs that you took and 30 photographs that APD
17 took.

18 A. Yeah, that's correct.

19 (Whereupon, plaintiff's attorneys

20 conferred off the record.)

21 Q. (By Mr. Johnson) Can you -- well, let me -- let
22 me ask you this. Looking at this log sheet -- which
23 obviously, I want to make a part of this file.

24 You obviously got involved on July 10, 2018 on
25 the night of, correct, sir?

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1 A. That's correct.

2 Q. And we -- you went out and took photos later on
3 that night, which we've already discussed and documented,
4 correct?

5 A. That's correct. Yes, that's correct.

6 Q. And the time looks like -- what time you went to
7 the scene to do the photos?

8 A. Okay. Then I'm going back to up and -- I -- I
9 went to the scene at 8:45 p.m.

10 Q. Thank you. That's what I wanted to know.

11 A. Yeah.

12 Q. What exhibit was that; do you remember? Do you
13 have that?

14 A. It's going to be -- for you, it should be 5 --
15 it should be Exhibit 5.

16 Q. So 8:30 -- 8:45 p.m.

17 A. Correct.

18 Q. In July. So in other words, probably still --
19 it would have some daylight to do that, right?

20 A. Yeah.

21 Q. All right. So now we're going back to
22 Exhibit 16.

23 A. Uh-huh.

24 (Whereupon, Plaintiff's Exhibit No. 16
25 was presented.)

1 Q. (By Mr. Johnson) So we -- when we see all of
2 these photos and the images where it says "date
3 modified," anything before 8:45, which is 8 --
4 probably -- which is 20 something. I don't know that
5 they're doing that, so it's not military time.

6 But any of those photos taken before
7 eight o'clock at night shouldn't be you, should they?

8 A. No. Yeah, it looks like their photographs were
9 taken between 3:15 a.m. and 4:01 p.m.

10 Q. Right. Okay.

11 So this sheet that I'm showing you right now,
12 that's not a printout of the photos that you took.

13 A. That's correct. That's not.

14 Q. All right. Because I'm just telling you, I
15 went -- I'm having a heck of a time trying to find the
16 photos that you took versus what they took. So I
17 apologize.

18 A. Yeah.

19 Q. All right.

20 MR. JOHNSON: Can you get the other attachment
21 and go back to Exhibit 16, please, Solomon. And it says,
22 "Other APD crime scene report attachment."

23 (Whereupon, plaintiff's attorneys
24 conferred off the record.)

25 MR. JOHNSON: So the first page, that's that

1 same printing -- incident report I think we've seen
2 before. Keep on rolling, please, Solomon. One page.
3 We'll go to the next attachment, crime scene incident.

4 (Whereupon, attachments to Plaintiff's
5 Exhibit No. 16 were presented.)

6 Q. (By Mr. Johnson) Now, this looks like kind of a
7 description of some of the photos, a photo log.

8 A. It's the photo log. It's a photo log.

9 MR. JOHNSON: Solomon, I need that. Bring it
10 back.

11 (Whereupon, attachments to Plaintiff's
12 Exhibit No. 16 were presented.)

13 Q. (By Mr. Johnson) Again, photos from APD; not
14 you, sir.

15 A. That's correct.

16 Q. Thank you.

17 MR. JOHNSON: Next.

18 (Whereupon, attachments to Plaintiff's
19 Exhibit No. 16 were presented.)

20 Q. (By Mr. Johnson) Same thing. APD description;
21 not yours.

22 A. That's correct.

23 Q. Crime scene incident and then this looks like
24 the report may be from the crime scene investigator.

25 A. That's correct.

1 Q. All right.

2 MR. JOHNSON: Will you roll this up so I can see
3 the bottom, please, Solomon. Thank you.

4 Q. (By Mr. Johnson) There's the measurement, the
5 23 feet, 9 inches we've been talking about, second
6 paragraph from the bottom, sir?

7 A. That's correct.

8 Q. All right. So at least according to this
9 document, Wilder went to the scene twice that -- on the
10 day of the incident.

11 A. That's what it looks like.

12 Q. It says "victim and his injuries". And then --
13 oh, but was unable to do so because he's receiving
14 medical attention. Then he went back at Zorn's request.
15 It looks like that's when he made the photographs that
16 included Officer Grubbs, at least according to Wilder's
17 report.

18 A. Yeah, that's correct. That's what -- the 80
19 Jesse Hill, that's going to be Grady Memorial. Yeah, he
20 went to the hospital to try to photograph the victim and
21 then he went to the incident location.

22 Q. Okay. Got it. Thank you, sir.

23 (Whereupon, Plaintiff's Exhibit No. 17
24 was presented.)

25 Q. (By Mr. Johnson) All right. Going to

1 Exhibit 17, please, sir. Still the same day, July 17,
2 2018, 5:02. "CIA Butler ran a criminal history and
3 public records, et cetera, on Jerry. That his suspended
4 Georgia driver's license. He had an 18-cycle criminal
5 history. See attached for details. Blasingame was
6 currently on parole. See attached."

7 I read that relatively correctly?

8 A. That's correct.

9 Q. And you do this just to -- you -- the same
10 reason why you looked at Officer Grubbs' --

11 A. Yes.

12 Q. -- internal affairs stuff and personnel file and
13 you do -- you do the same for both.

14 A. Yeah, that's correct.

15 Q. Appreciate that. All right.

16 So let's go over to the attachment, please.

17 (Whereupon, attachments to Plaintiff's
18 Exhibit No. 17 were presented.)

19 Q. (By Mr. Johnson) In terms of his past offenses
20 and so forth, you didn't list those out. Obviously,
21 they're attached. Correct, sir?

22 A. Yeah, that's correct.

23 Q. Is there any particular reason why -- was there
24 anything you found particularly important or not or you
25 just attached them and let people come to their own

1 conclusion?

2 A. I attach them and let them come to their own
3 conclusion on anything relative to this investigation
4 when they see their criminal history.

5 Q. Okay.

6 (Whereupon, plaintiff's attorneys
7 conferred off the record.)

8 MR. JOHNSON: All right. Exhibit 18, please.

9 (Whereupon, Plaintiff's Exhibit No. 18
10 was presented.)

11 Q. (By Mr. Johnson) You -- it looks like the same
12 thing on Grubbs and he didn't have a criminal history. I
13 just -- he has an active Georgia license. All right.

14 (Whereupon, Plaintiff's Exhibit No. 19
15 was presented.)

16 Q. (By Mr. Johnson) 19 looks like -- Exhibit 19,
17 pardon me. So your report -- it looks like you went --
18 you got the radio traffic.

19 A. Yeah.

20 Q. Is that on some kind of a disk, then?

21 A. It was. And this one right here let me state
22 how I attached that.

23 Q. Thank you.

24 A. The audio was attached to it. You should have
25 the audio file. Yeah, I have it here, so it should be

1 attached. It is a -- it looks like it's two -- it's two
2 audio files.

3 Q. Okay. According to your second paragraph, from
4 2:36 to 2:48 p.m. -- oh, that's when this traffic is.

5 A. Yeah. That's the -- that's the radio traffic
6 that was reported --

7 Q. Okay.

8 A. -- that I attached to this case file.

9 Q. Grubbs and Shelley did not initially advise
10 radio that they were out with the subject.

11 A. Correct.

12 Q. They didn't say, like, investigating blah, blah,
13 blah, going after, or anything like that.

14 A. That's correct.

15 Q. Is that something in a perfect world that's
16 supposed to happen, to the best of your knowledge?

17 A. When things happen. I'm not even going to give
18 an opinion. This is what happened in this case.

19 Q. Okay. "The first radio traffic related to this
20 incident occurred at approximately 2:36 p.m."?

21 A. That's correct.

22 Q. "When Grubbs advised that he was at I-20
23 eastbound and I-85 north on-ramp because a suspect ran.
24 And Grubbs requested an ambulance, paren, four, paren,
25 and the fire department to his location."

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1 What does that "four" mean?

2 A. The ambulance is a -- you know, like a signal
3 four, so that's what -- that's what he stated on the
4 radio. Just kind of letting you know what that means.

5 Q. Okay.

6 A. Could have done it the reverse way.

7 (Whereupon, Plaintiff's Exhibit No. 20
8 was presented.)

9 Q. (By Mr. Johnson) Exhibit 20, July 24, 2018. It
10 looks like you contacted Sandra Michaels regarding doing
11 an interview relative to Grubbs. And then --

12 A. That's correct.

13 Q. -- advice to her client about him making any
14 statements.

15 A. That's correct.

16 Q. Again, you followed up. You tried the night of
17 and this is what you do to see if that's changed. Right,
18 sir?

19 A. That's correct.

20 Q. Thank you.

21 (Whereupon, Plaintiff's Exhibit No. 21
22 was presented.)

23 Q. (By Mr. Johnson) Exhibit 21 is 7/25 and this is
24 your review of Grubbs's personnel file?

25 A. That's correct.

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1 Q. Now, on page 2 of 5 and following that, there's
2 some reviews of incident numbers and each one is numbered
3 and each one person has their own separate number.

4 So apparently, these items were in Grubbs's
5 personnel file, but not in the internal affairs file that
6 you saw. Correct?

7 A. That is correct.

8 (Whereupon, Plaintiff's Exhibit No. 22
9 was presented.)

10 Q. (By Mr. Johnson) Exhibit 22 is 7/27. Got an
11 e-mail from Atlanta Fire Department Sergeant Cortez,
12 C-o-r-t-e-z, last name Stafford, S-t-a-f-f-o-r-d?

13 A. Correct.

14 Q. He says contained reports?

15 A. That's correct.

16 MR. JOHNSON: Can I see the attachment real
17 quick, please.

18 (Whereupon, attachments to Plaintiff's
19 Exhibit No. 22 were presented.)

20 Q. (By Mr. Johnson) So the first one is entitled
21 "The Call For Service"?

22 A. Yes.

23 Q. All right. That gives us times and so forth
24 of --

25 A. That's the times for the fire department side of

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1 things.

2 Q. Yes, sir. Thank you.

3 MR. JOHNSON: Next please.

4 (Whereupon, attachments to Plaintiff's
5 Exhibit No. 22 were presented.)

6 Q. (By Mr. Johnson) What's the second document?

7 A. The second document -- well, hold on. Are you
8 looking at it right now?

9 Q. Yes, sir.

10 MR. JOHNSON: Roll up to the top, please,
11 Solomon.

12 Q. (By Mr. Johnson) All right.

13 A. Oh, that's an incident number created by the
14 City of Atlanta Fire Department. So that's just their
15 incident -- of their incident report.

16 Q. Okay. Thank you.

17 MR. JOHNSON: Going back to the attachments,
18 please.

19 (Whereupon, attachments to Plaintiff's
20 Exhibit No. 22 were presented.)

21 Q. (By Mr. Johnson) The third document is what
22 they call the fire incident report?

23 A. Kind of redundant. But yeah, they do, like, a
24 unit report, incident report. But this one is going to
25 be the -- still on the fire department side.

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1 Q. I see. Okay.

2 MR. JOHNSON: Let's go back to the attachments,
3 please.

4 (Whereupon, attachments to Plaintiff's
5 Exhibit No. 22 were presented.)

6 Q. (By Mr. Johnson) Next the patient care report
7 for the EMS side of things probably?

8 A. That's correct.

9 MR. JOHNSON: Okay. Go ahead. Go back.

10 (Whereupon, attachments to Plaintiff's
11 Exhibit No. 22 were presented.)

12 Q. (By Mr. Johnson) And that -- it says "T-10 Unit
13 Report." What's that, Taser?

14 A. No. This is still a fire department report.
15 It -- let me scroll -- let me go back real quick.

16 Q. Well, open the --

17 A. Yeah, each department kind of has -- the
18 department's going to have multiple reports for the fire
19 side and -- okay. That's Truck 10; so T-10, you're
20 looking at Truck 10. So the -- when you have a unit
21 report and says it's E-10, that's Engine 10 --

22 Q. Got it.

23 A. -- in a unit report and is T-10 is Truck 10.
24 That's their personnel and unit report as well.

25 Q. Thank you, sir.

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1 A. Two -- two apparatuses responding.

2 Q. Thank you. Let's go to Exhibit 23 which is
3 8/14/18.

4 (Whereupon, Plaintiff's Exhibit No. 23
5 was presented.)

6 Q. (By Mr. Johnson) It looks like you're speaking
7 with Investigator Kindu, K-i-n-d-u, Franklin to request a
8 copy of Grubbs's training file.

9 A. Correct.

10 MR. RADNER: Is it 23?

11 MR. JOHNSON: 23, yes.

12 Q. (By Mr. Johnson) Which among other things,
13 includes his training on the Taser, sir.

14 A. That's correct.

15 Q. All right. And the last time he was recertified
16 April 25, 2018.

17 A. Correct.

18 (Whereupon, Plaintiff's Exhibit No. 24
19 was presented.)

20 Q. (By Mr. Johnson) Exhibit 24 is August 15.
21 Okay. You got an e-mail from Zorn, "The approved
22 incident report and use of force report."

23 A. That's correct.

24 MR. JOHNSON: So let's go to the attachment, the
25 APD use of force report, please.

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1 (Whereupon, attachments to Plaintiff's
2 Exhibit No. 24 were presented.)

3 Q. (By Mr. Johnson) What is your understanding of
4 what this document is, sir?

5 A. It's Atlanta Police Department's use of force
6 report.

7 Q. And who completes it?

8 A. By -- any time the use of force is completed --
9 I mean, it's a general statement. I don't work for
10 Atlanta Police Department or know their exact procedures
11 on this.

12 It's the use of force for -- when force is used,
13 these are created and completed by the officer and also
14 the supervisors's approval in most situations. I would
15 assume this is the same.

16 Q. Okay. The information on this report, I'll take
17 it, that you don't know where it comes from.

18 A. I could only assume. You'd have to ask APD on
19 specifically where and who and how they got these -- you
20 know, completed this document.

21 MR. JOHNSON: Can you scroll down to the bottom
22 so I can see who signed off on it.

23 MR. RADNER: 4370.

24 Q. (By Mr. Johnson) At least at the bottom of the
25 document, there is no -- I see, you know, ID number and

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1 so forth, but I don't see signatures. Do you?

2 A. I don't. It's not on mine; that's not on my
3 attachment.

4 MR. JOHNSON: All right. Okay. Go back to
5 where we were at the top.

6 Q. (By Mr. Johnson) Can you tell me, Special Agent
7 McCallum, is this a document normally sent to you by APD?

8 A. Normally if I am conducting the investigation.

9 Q. In other words, you ask for it specifically.

10 A. Yes.

11 Q. On this document under force used, it says, "Did
12 the officer attempt to de-escalate the situation?" The
13 box "yes" is checked. It says, "If yes, please describe.
14 Officer Grubbs identified himself as the police and told
15 the subject to stop running several times."

16 Would you agree that, at least thus far in your
17 report, we've not heard anything from anyone so far in
18 your report making that claim?

19 A. The only other person that was there was Officer
20 Grubbs and he did not interview.

21 Q. So you didn't ever hear that from anybody until
22 such time as you saw this report.

23 A. That would be accurate.

24 Q. You could only assume that comes from Officer
25 Grubbs.

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1 A. That's correct.

2 Q. Okay. And if he testified under oath at his
3 deposition that he told my client to stop one time,
4 that -- it would be inconsistent with the information
5 that I just read to you.

6 A. I didn't interview Grubbs so I -- you're reading
7 what I'm reading here.

8 Q. Yes, sir.

9 That's inconsistent with the testimony that I
10 just set forth for you assuming it's true. Correct?

11 Correct. You're seeing the same document I am.
12 I am -- I am not -- I don't know what he said in his
13 disposition -- or deposition.

14 Q. As it pertains to the body camera, same section.

15 A. Uh-huh.

16 Q. It says, "If no, why not? The body camera was
17 turned on after the incident and was not in buffering
18 mode. So no usable footage is available."

19 Did I read that right?

20 A. You did.

21 Q. Under the CEW, of course, Conducting Electrical
22 Weapon, the APD document says, quote, CEW prongs were
23 deployed making contact in the subject's back. The
24 accused rolled down an embankment where his head made
25 contact with a slab of concrete causing head trauma.

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1 Did I read that right?

2 A. That's correct.

3 Q. Thank you.

4 MR. JOHNSON: Go ahead to the bottom of that
5 paragraph, please.

6 Q. (By Mr. Johnson) And can you tell me, if you
7 know, is this document an internal affairs document?

8 A. You'd have to ask APD.

9 Q. Okay. You have no idea who completed this or --
10 or why.

11 A. You'd have to ask APD or refer to APD.

12 Q. Okay. I'm asking you. Do you know?

13 A. Right now, I do not.

14 MR. JOHNSON: Let's go to the next document.

15 (Whereupon, plaintiff's attorneys
16 conferred off the record.)

17 (Whereupon, attachments to Plaintiff's
18 Exhibit No. 24 were presented.)

19 Q. (By Mr. Johnson) The other attach -- other APD
20 incident report -- and we're clicking on it. It's just
21 being slow to react. I'm sorry.

22 A. I understand.

23 Q. In this document, at least, in the upper
24 right-hand corner says it was done also on August 15,
25 2018, correct?

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1 A. Correct.

2 MR. JOHNSON: Go ahead go down, please. And
3 then stop there.

4 Q. (By Mr. Johnson) Under narrative, it at least
5 says -- it appears that this was -- it appears, by the
6 reading of it, this was done by Officer Grubbs.

7 A. That's correct.

8 Q. Okay. Is that -- is this the first time you got
9 this report, or any report for that matter, from Officer
10 Grubbs?

11 A. That's correct.

12 Q. So incident on June -- July 10. This you got on
13 August 15.

14 A. Correct.

15 Q. A month and five days later.

16 Based on your experience, is that a normal time,
17 long time, short time? How do you describe that?

18 A. I don't have an opinion.

19 Q. If -- if they had signed it a week and -- if
20 Grubbs signed it a week after the incident and his
21 supervisor four days after that and -- you know, July 21,
22 is there a reason that you're aware of why this wouldn't
23 be sho- -- given to you before this August 15?

24 A. There was no reason.

25 (Whereupon, plaintiff's attorneys

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1 conferred off the record.)

2 MR. JOHNSON: Let's go to Exhibit 25, please.

3 (Whereupon, Plaintiff's Exhibit No. 25

4 was presented.)

5 Q. (By Mr. Johnson) That's September 4, 2018,
6 10:00 a.m. It looks like you got an e-mail from
7 Michael Banja, B as in boy, a-n-j-a. Who's that, sir?

8 A. I'm pulling that up right now.

9 Q. Sorry.

10 A. That's -- yeah, it's a senior officer for
11 professional department -- professional development unit.
12 So it's with APD.

13 Q. Right.

14 And what's -- what's the -- if you can tell,
15 what's the importance or not of the Taser documentation
16 you got here?

17 A. Oh. This is just saying that the same Taser
18 used in that incident was the Taser that was assigned to
19 Officer Grubbs.

20 Q. Got it.

21 (Whereupon, plaintiff's attorneys
22 conferred off the record.)

23 (Whereupon, attachments to Plaintiff's
24 Exhibit No. 26 were presented.)

25 (Whereupon, Plaintiff's Exhibit No. 26

1 was presented.)

2 Q. (By Mr. Johnson) Exhibit 26, September 6, 2018,
3 9:00 a.m. It looks like you went to try to get an update
4 on Jerry's condition.

5 A. Correct.

6 Q. You spoke with his nurse Peter Gordin,
7 G-o-r-d-i-n. It looks like he showed you some of the
8 charts and reports from August 1, 2018.

9 A. Correct.

10 Q. That revealed that my client was a quadriplegic
11 due to a C-3, C-4 injury?

12 A. That's correct.

13 Q. He was on a ventilator until a few days ago?

14 A. Correct.

15 Q. Apparently, the nurse was not aware of what
16 caused the injury. He stated that he was told
17 Blasingame -- Blasingame fell down stairs.

18 A. Correct.

19 Q. Blasingame did not talk about what happened to
20 any of the staff at the hospital; in other words, what
21 happened on the day of the incident?

22 A. He -- yes.

23 Q. He was still in custody but not guarded.

24 A. That's correct.

25 Q. "In custody," does that mean he's handcuffed or

1 anything?

2 A. No, not -- no. That's just -- he's technically
3 under arrest, but he's not in any condition where he can
4 flee; therefore, the hospital has him labeled as in
5 custody. But he doesn't have an officer out front of
6 his -- his room at that time.

7 Q. Didn't -- did not have an officer in the --

8 A. No, he didn't.

9 Q. Thank you, sir. Okay.

10 It looks you like you went in the room. You
11 said he was alert and not on a ventilator. He could
12 briefly speak a few words. He told you that his family
13 visited him one time. He could not remember what
14 happened. He said that he was told by somebody at the
15 hospital that he fell. He could speak and move his head
16 side to side.

17 Blasingame was not able to fully be interviewed
18 because of his medical status, correct?

19 A. That's correct, yes.

20 Q. Did you -- did you read him his rights before
21 you talked to him?

22 A. And it -- I would have stated that there. It
23 was more of an assessment to see -- this -- he had just
24 come off a ventilator. He could barely whisper. So
25 I didn't -- I knew there wasn't going to be an interview.

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1 So this is kind of a check on him and his status to see
2 if it was possible to interview him.

3 Q. Okay.

4 A. I did not Mirandize him.

5 Q. Thank you, sir.

6 So he could bare -- basically speak at a
7 whisper, correct?

8 A. Yeah, he -- yeah, he was having a lot of trouble
9 speaking. He had just come off that ventilator, so...

10 Q. Sure, for -- it looks like a couple of months.

11 A. Yeah. And so he was -- even the brief
12 conversation, he was struggling.

13 Q. But you obviously asked him if he could remember
14 what happened and he told you he could not.

15 A. Correct.

16 Q. I'll take it -- did you tell him anything about
17 what happened?

18 A. I did not.

19 Q. Did you see him move his arms or his legs or
20 anything at all that looked inconsistent with someone
21 being a quadriplegic?

22 A. I didn't see him move.

23 Q. And from at least my part of the report or my --
24 the report that I have, Special Agent McCallum, I have
25 that's the last page of it.

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1 Do you have anything after that page,
2 September 6, 2018?

3 A. There's one -- the -- there's one document there
4 that's received at -- I -- I got it around -- on
5 the 13th, I received medical records involving his
6 medical records from Grady. I don't know if you got that
7 last one there.

8 Q. I don't.

9 So is that Exhibit, like, 27?

10 A. Yeah, I -- yes, I believe so, if that's your
11 count. I believe that's the last one there.

12 (Whereupon, plaintiff's attorneys
13 conferred off the record.)

14 Q. (By Mr. Johnson) Well, okay. There's no
15 exhibit number on it, but -- I didn't know where these
16 went. So now -- now I do.

17 A. They -- yeah, okay. They came a little bit
18 later. They may not have had a number on it --

19 Q. I'm going to --

20 A. -- at the time. Yeah.

21 Q. -- I apologize to you.

22 A. No problem.

23 So that's actually the last report on this case
24 file. The case was reassigned and the rest of them are
25 going to be case updates. You know, that's after the

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1 case was turned over to the District Attorney's Office.

2 Q. Got it.

3 A. There are no other investigative summaries.

4 Q. Well, let me -- let me say this to you. After
5 Exhibit 26, which is that September 2018 document that we
6 just went over --

7 A. Yeah.

8 Q. -- you saw Jerry.

9 It looks like there's a document from
10 September 1, 1:41 p.m. where you got a document -- or you
11 got an e-mail from the Fulton County District Attorney's
12 Office, Greg Thomas, that contained Grady EMS reports
13 related to this incident.

14 A. Oh, that's -- correct. Yeah, that's the one.
15 That's -- I believe he subpoenaed those documents for me.

16 Q. Okay. Should -- so should I put that in your
17 report before Exhibit 26? Or how do you do that so I
18 just know how you keep it.

19 A. I would have done it chronological. That's just
20 me. It's really not important of where it would come.

21 Q. Okay. And then the attachment you have is the
22 Grady EMS worksheet?

23 A. That's correct.

24 Q. Okay.

25 MR. JOHNSON: Get that attachment just so I can

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1 see it, please, Solomon. Thank you very much.

2 (Whereupon, plaintiff's attorneys
3 conferred off the record.)

4 THE WITNESS: It's probably pretty large, yeah.

5 (Whereupon, e-mail attachments were
6 presented.)

7 MR. JOHNSON: All right. I've seen these.

8 Thank you.

9 Q. (By Mr. Johnson) Let's go back, then, to -- it
10 looks like the next one's on -- I'm going to -- I'm going
11 to put that in my report file. That September 1, I'm
12 going to put it right before the September 6 Exhibit 26.

13 A. Sounds good.

14 Q. Like you, a chronological Virgo boy.

15 All right. Let's do -- the next one says
16 Thursday, September 26, 10:00 a.m. You contacted Fulton
17 County District Attorney's Office, Greg Thomas, regarding
18 the status of the current investigation.

19 "Thomas advised the case has been reassigned to
20 Assistant District Attorney Shaneah, S-h-a-n-e-a-h,
21 Jenkins. Thomas also advised the case is still under
22 review."

23 No other information at that time at least,
24 according to that document, correct?

25 A. That's correct.

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1 Q. Then I got another document, not an exhibit, but
2 it -- October 7, 2020, 11:00 a.m.

3 A. That's going be the -- the case was reassigned
4 at that point. I had left this unit. So that's going to
5 be Herman Taylor. It had -- it was reassigned to him
6 after it was released to the D.A.'s Office. Those are
7 his summaries and just case updates on the status at the
8 D.A.'s Office.

9 Q. Okay. So when did the assignment get reassigned
10 from you?

11 A. K-3 assignment was on Sept- -- oh, it looks like
12 May 1st.

13 Q. Of what year?

14 A. 2019. Sorry. Yeah. Oh, actually, yes. On
15 Wednesday, May 1st, 2019, the case was resigned to S.A.
16 Herman Taylor.

17 Q. I know what's going on. Sorry. I missed the
18 change of the year. So --

19 A. Yeah, you did.

20 Q. -- so your last exhibit, Exhibit 26, is
21 September 6, 2018, which we've just discussed, correct?

22 A. Yes. That's where I went, yeah.

23 Q. Got it.

24 And now -- so, like, what -- gee, three, five --
25 eight months later-ish, the case --

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1 A. Not.

2 Q. -- is reassigned to Special Agent Taylor.

3 A. Yes. I have on September 13th, I received the
4 documents from Grady EMS. On November 28th, I myself did
5 a case update status. And then the case was reassigned
6 on May 1st.

7 Q. So the Grady EMS we've already talked about.

8 A. Yes. That was going to be on September 13th.

9 Q. Yes, sir.

10 A. And then I did a case update myself on
11 November 28th of 2018.

12 Q. Got it. There it is.

13 A. And that's -- then the case was reassigned on
14 May 1st --

15 Q. Got it.

16 A. -- to S.A. Taylor.

17 (Whereupon, a document was presented.)

18 Q. (By Mr. Johnson) So let's go to November 28th,
19 please, 2018.

20 A. Yes.

21 Q. You contacted Greg Thomas. He's with the
22 District Attorney's Office. And the case was still under
23 review.

24 A. That's correct.

25 Q. That's your last official note, it looks like.

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1 A. It is. That's correct.

2 Q. Then -- yeah, May 1, 2019, case resigned to
3 Taylor. Is there a reason why it was reassigned?

4 A. That's correct. I went on a task force with the
5 DEA and left this unit. So my cases were reassigned to
6 other agents.

7 Q. Okay. And then, of course -- at least according
8 to the file -- September 26, 2019, Taylor got an update
9 from Thomas. That's where the case had been reassigned
10 to another D.A.

11 Then it was still under review?

12 A. Yes.

13 Q. Yeah, I missed one from January 21, 2019.
14 Sorry.

15 A. No problem. Giving a case update.

16 Q. That's from Taylor just saying that he talked
17 with Greg Thomas and it's still under review?

18 A. Correct.

19 Q. I have a July 25, 2019 where Special Agent
20 Taylor contacted the D.A. Still pending at that time,
21 correct?

22 A. Correct.

23 Q. We've already talked about the reassignment to
24 D.A. Thomas. That's 9/26/19.

25 And then it looks like the next contact, it

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1 looks like, almost a year later I have October 7, 2020?

2 A. Correct.

3 Q. And then they closed the case and said it would
4 not be -- the prosecutor said not be presented to a grand
5 jury.

6 A. That's correct.

7 Q. And that the decision was made last week, at
8 least according to this document from Taylor.

9 A. That's correct.

10 Q. Okay. And then the next document, November 13,
11 2020. And that obviously says it's -- D.A.'s Office
12 closing their file.

13 A. Correct.

14 Q. Once the D.A.s closes their file, is your file
15 therefore automatically closed as well?

16 A. Not automatically, but we will close our case
17 after that.

18 Q. And it -- was your case closed at that time?

19 A. It -- I don't exactly know the exact date it was
20 closed. I'd have to go look at the hard case file. But
21 it was ready to be closed at that time.

22 Q. Okay. And again, whatever the internal affairs
23 does, you have no idea.

24 A. I do not.

25 Q. All right. Has anybody from internal affairs

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1 ever asked you to share any part of your report with
2 them?

3 A. No.

4 Q. The last time you spoke to anybody about this
5 particular incident officially, would it have been
6 basically when you transferred the report over to
7 Taylor -- or the file?

8 A. Yes. That's correct.

9 Q. So you actually have never spoken with Grubbs
10 personally.

11 A. I have not.

12 Q. Other than speaking with Shelley and Zorn
13 personally -- well, there's -- and obviously, you tried
14 talking to Blasingame and apparently he has no memory of
15 the incident, right?

16 A. To my knowledge.

17 Q. All right. So as it relates to this matter, has
18 anybody -- other than when we contacted you and served a
19 subpoena, have you had any contact with the Attorney's
20 Office with the City of Atlanta to talk about this case?

21 A. The Fulton County -- the Fulton County D.A.'s
22 Office, is that what your question is?

23 Q. Yeah, sure.

24 A. No, I haven't talked to anybody else after I --

25 Q. How about that now from the City of Atlanta

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1 Securities, folks involved in the defense of this case?

2 A. Oh, no. I haven't talked to anybody, no.

3 MR. JOHNSON: All right. I greatly appreciate
4 your time walking us through this. Thank you very much.

5 THE WITNESS: No problem. Thank you.

6 MR. JOHNSON: Counsel?

7 MS. NAIR: (No audible response.)

8 MR. JOHNSON: Alisha, any questions?

9 MS. NAIR: (No audible response.)

10 MR. JOHNSON: Okay. Sorry. I apologize. I
11 didn't mean to interrupt you. Oh, her mic's not working.
12 That's going to make it hard to question.

13 If you don't mind, Special Agent McCallum, would
14 you mind sending us -- or asking some of your officers to
15 please send us the 31 pictures from you folks? Because I
16 can't find them. That you personally took at the scene.

17 THE WITNESS: Yeah, you can contact open
18 records. I don't think that -- I'm not going to release
19 it. Contact them back, let them know. I'm not -- I'm
20 not sure as to why they didn't transfer over or why that
21 hyperlink -- all the other hyperlinks seem to work. So
22 I can't tell you why they're not there. But they should
23 send them out to you.

24 MR. JOHNSON: Thank you, sir.

25 (Whereupon, a recess was taken.)

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1 MS. NAIR: Can you all hear me now?

2 THE WITNESS: Yes.

3 MS. NAIR: All right. Good, then. Okay.

4 EXAMINATION

5 BY MS. NAIR:

6 Q. I was just saying I have a few questions.

7 You're not employed by the City of Atlanta; is
8 that correct?

9 A. That is correct.

10 Q. Are you employed by Fulton County?

11 A. I am not.

12 Q. Your employer is the State of Georgia?

13 A. That's correct.

14 Q. When you conduct your investigation, who
15 instructs you to conduct the investigation?

16 A. My case -- the case was assigned to me by my
17 supervisor at the GBI.

18 Q. And who are you conducting the investigation
19 for?

20 A. I'm conducting it for the Atlanta Police
21 Department.

22 Q. Who do you turn your investigation results over
23 to?

24 A. I turn the investigation results over to the
25 Atlanta Police Department and also to the Fulton County

1 District Attorney's Office.

2 Q. When you were asked questions about your summary
3 of Officer Zorn, you testified that that interview is not
4 recorded.

5 A. That's correct.

6 Q. Why is that interview not recorded, but your
7 other interviews are?

8 A. That's -- I wasn't exactly interviewing Zorn. I
9 was getting a case brief trying to get an idea of what
10 happened; therefore, I know what actions I need to take.
11 Zorn was not a witness, if that makes sense, to the
12 investigation.

13 Q. So you -- would it be fair to state that you are
14 not interviewing Officer Zorn for purposes of fact
15 gathering?

16 A. I'm trying to find a -- it's -- you could say
17 yes, not spe- -- I'm looking for specific facts, but I
18 need to know what happened. That way I know to go --
19 who's involved, things like that. So it's information
20 relative to the case.

21 Q. Correct.

22 But it would be fair to say that you're not
23 specifically seeking the facts from Officer Zorn; you're
24 seeking to find out information as to where to go to
25 gather the facts --

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1 A. That's correct.

2 Q. -- necessary for your investigation.

3 A. That's correct.

4 Q. And so the information that is provided in your
5 summary, does that information have to be exhausted?

6 A. Meaning? The -- does the information have to be
7 exhausted? I'm sorry.

8 Q. Exhausted. Does it have to contain every detail
9 about the incident?

10 A. It does not.

11 Q. Does it normally contain every detail about the
12 incident?

13 A. It does not.

14 Q. The investigation summary that you completed for
15 Officer Shelley --

16 A. Yes.

17 Q. -- that summary is not a transcript; is that
18 correct?

19 A. That's correct.

20 Q. The audio for that investigation is included in
21 your report; is that correct?

22 A. That's correct.

23 Q. And the audio is a complete transcription of
24 what actually occurred during your conversation with
25 Officer Shelley; is that correct?

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1 A. That is correct.

2 Q. And so if the information is not included in the
3 summary, it doesn't mean that that information was not
4 told to you; is that correct?

5 A. That is correct.

6 Q. You have to rely on the audio for everything
7 that was told to you.

8 A. That's correct.

9 Q. You were asked earlier about a dollar bill --

10 A. Yes.

11 Q. -- being found on the scene; is that correct?

12 A. He was -- he asked me about that, yes.

13 Q. And you stated that the information about the
14 dollar bill was not included in your investigative
15 summary; is that correct?

16 A. I did not include that in the investigative
17 summary, correct.

18 Q. However, you did take pictures from the
19 incident; is that correct?

20 A. I did. Correct.

21 Q. Was the dollar bill that was mentioned in any of
22 the photos that were taken from the scene?

23 A. Can you give me one minute to look. Let me look
24 those up real quick, okay?

25 Sorry. It's downloading now. I just need to --

1 I'll review these real quick.

2 (Whereupon, the witness reviewed the
3 files.)

4 Q. (By Ms. Nair) And maybe I can help out. If I
5 can turn your attention to the 9641 image.

6 A. Okay.

7 Q. And the 9642 image.

8 A. My computer is always slow. You said 96...

9 Q. 41.

10 A. Where are you getting the 9641? I don't have --

11 Q. Let me -- let me share my screen.

12 A. Okay.

13 (Whereupon, an unidentified photograph
14 was presented.)

15 Q. (By Ms. Nair) Do you recognize this photo?

16 A. I do and I do not believe that's a photo I took.
17 That equipment -- I don't believe that's a photo --
18 that's a photo from APD, to my knowledge.

19 Q. Okay.

20 A. Sorry. I think that's why it's labeled
21 different. Yeah, that's a photograph from APD. I have
22 seen their -- I'm looking at my photographs. I know I
23 saw them. I don't know why y'all may not have mine.

24 Q. Okay. So you didn't --

25 A. And in reference to that, I'm looking right now

1 to see if that's in my photographs. I don't see it in my
2 photographs.

3 Q. Okay. So you didn't take this photo.

4 A. I did not. That's not my photograph.

5 (Whereupon, an unidentified photograph
6 was presented.)

7 Q. (By Ms. Nair) And you -- you didn't take this
8 photo either.

9 A. No. And that would make sense because the
10 equipment's there. They wouldn't -- they wouldn't leave
11 that. Must have been --

12 Q. Okay.

13 A. -- a APD crime scene photograph.

14 Q. Okay.

15 A. So you --

16 Q. Did you have -- forgive me. Go ahead.

17 A. Yeah, I don't have a photograph of the dollar --
18 it -- the dollar bill is not there in my photographs.

19 Q. Okay. Did you have an opportunity to review any
20 of the vid- -- of the photographs that I just showed you?

21 A. I did. It's just been a long time. I did
22 review them.

23 Q. Okay. Now, did you see the dollar bill in those
24 photographs?

25 A. I did.

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1 Q. Was that information provided to you by Atlanta
2 Police Department?

3 A. I don't recall.

4 Q. I want to turn your attention to a question that
5 was asked about when Mr. Blasingame was in custody.

6 Can you -- did you make a determination as to
7 when Mr. Blasingame was in custody?

8 A. I would be giving you my opinion on how I
9 interpret the law on that. I -- the specific moment of
10 in custody was not discussed and I did not interview
11 Grubbs. If you understand what I mean. That's going to
12 be a question of generally -- you know, a legal question
13 when he was in custody.

14 Q. Okay. Earlier you were asked a specific
15 question, however, about Mr. Blasingame being in custody
16 when he was injured. Do you recall that testimony?

17 A. I do. And -- I do. That was my opinion that
18 he was in custody.

19 Q. That he was in custody.

20 A. That's my opinion, yes.

21 Q. Can you break that down with your opinion --

22 A. Did --

23 Q. -- that you testified to.

24 A. When he ran from --

25 Q. When --

1 A. Yeah, you want me to explain why I say that?

2 Q. I want you to first explain when you had the
3 opinion that Mr. Blasingame was in custody, at what
4 point.

5 A. At the very beginning of my investigation. As I
6 said --

7 Q. And at what point during the incident was
8 Mr. Blasingame in custody?

9 A. In my opinion, that's a legal question. Meaning
10 when he ran from police and broke the law, technically,
11 he is in custody. They're -- they're going to execute an
12 arrest. When you Tase someone or use force, you are
13 seizing that individual. That's my interpretation of the
14 law.

15 So when he asked if he was in custody when he
16 was Tased, my answer is yes. That is not an
17 investigative -- I did not get that from the
18 investigation. That's my interpretation of the law, when
19 he was actually in APD custody.

20 Q. Okay. So in your report, you did not make a
21 determination --

22 A. I did not make a -- that's correct. I did not
23 make a determination.

24 Q. Well, let me finish the question just so the
25 record is clear.

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1 In your report, you did not make a determination
2 as to when Mr. Blasingame was in custody.

3 A. That's correct.

4 Q. You are only tasked with the -- with finding
5 facts; is that correct?

6 A. That's correct.

7 Q. And turning those facts over to different
8 agencies; is that correct?

9 A. That's correct.

10 Q. For the agencies to then make a determination as
11 to -- let me take a step back.

12 For the District Attorney's Office to make a
13 determination as to whether or not a crime occurred --

14 A. That's correct.

15 Q. -- is that correct?

16 A. That's correct.

17 Q. And to assist the Atlanta Police Department in
18 determining whether or not any of the rules were
19 violated.

20 A. That is correct.

21 Q. Do either of those agencies ask you to draw an
22 opinion as to anything outside of the facts that you
23 provide?

24 A. They do not.

25 Q. So when you testified here today as to your

1 opinion of custody, that is just based on your general
2 knowledge.

3 A. Correct.

4 Q. Okay. The last thing I want to discuss is your
5 investigation timeline. You begin your investigation on
6 the date of the incident. Is that always the case?

7 A. That's not always the case.

8 Q. But in this instance, you began your
9 investigation on the date of the incident.

10 A. That's correct.

11 Q. Who determines when your investigation is
12 complete?

13 A. My supervisor.

14 Q. And until your supervisor informs you that the
15 investigation is complete, do you continue gathering
16 facts?

17 A. I do.

18 Q. How -- or what do you use to make the
19 determination as to how to gather the facts?

20 A. What do I use to let me know what -- in other
21 words -- I'm sorry. What's the question?

22 Q. That question might be unclear. I -- my
23 apologies.

24 A. Sorry.

25 Q. How do you gather the facts necessary to

1 complete your investigation?

2 A. Well, we -- it's kind of a multitude of things.
3 I mean, everything that's available, whether it be video
4 or interviews. I have a manual on use of force
5 investigations which is a guide to let us know exactly
6 every aspect that we should be looking for. Not all of
7 it applies in every case.

8 Q. And do other individuals continuously bring you
9 information to include in your investigation?

10 A. They do.

11 Q. And as they bring you that information, do you
12 update your investigation?

13 A. I do.

14 Q. In this instance, how would you know -- or is
15 there an indication of your -- in your report that your
16 supervisor told you that the investigation was complete?

17 A. There is not a specific indication or summary
18 that it was complete, but everything has to be approved.
19 Although some of these are approved before the case can
20 be released. So -- upon its release, summaries are
21 approved by a supervisor; so therefore, the case is
22 approved. It's still in a, you know, open status, but --
23 if that answers your question.

24 Q. It does.

25 And when you complete your investigation --

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1 A. The --

2 Q. -- you then turn it over to the various agencies
3 that we mentioned before.

4 A. That is correct.

5 Q. Do you release information before your
6 investigation is complete?

7 A. It's possible that I do that. But routinely,
8 no.

9 Q. Is there any indication that you released
10 information before this investigation was complete?

11 A. There is not.

12 MS. NAIR: I have no further questions.

13 EXAMINATION

14 BY MR. JOHNSON:

15 Q. Special Agent McCallum, if Officer Grubbs in
16 this case testified under oath in his deposition that my
17 client was in custody even -- he said, I want you to
18 assume, even before he Tased my client -- but for the
19 purpose of my question as of the time of Tasing my
20 client, that would be consistent with what you testified
21 to today, wouldn't it?

22 A. I can give you my opinion of the law, but that's
23 consistent with my opinion of the law.

24 Q. Okay. All right. So apparently, there is --
25 there are photographs of a one-dollar bill that is in the

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1 area of where my client fell that you could see in the
2 Atlanta Police Department crime scene photo, correct?

3 A. That's correct.

4 Q. All right. And was -- that dollar bill was not
5 there when you got there.

6 A. It was not.

7 Q. If it was there, I'll take it, you would have
8 likely noted that and taken it into custody and marked it
9 as evidence. Right?

10 A. Yes.

11 Q. In fact, we've seen many times Atlanta said that
12 they had taken nothing into custody. Right?

13 A. They did not take any physical evidence.

14 Q. Which nothing is nothing, right?

15 A. That's correct.

16 Q. So no dollar bill?

17 A. Correct.

18 Q. We don't know what happened to it, but they were
19 there and documented until the time you got there.

20 A. That's correct.

21 Q. All right. Would you expect them just to leave
22 it on the ground to just roll around?

23 A. I don't have any opinion.

24 Q. You'd expect them to take it into custody and
25 mark it like you would have?

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1 A. I don't have an opinion.

2 Q. Well, okay. In the photos that you have, you
3 saw I know at least one wire from the Taser. Correct?

4 A. Correct.

5 Q. How many wires come out? Isn't it two?

6 A. That's correct.

7 Q. You only found one.

8 A. I believe so. I'd have to go refer back. If
9 that's what my summary states -- my report states, that's
10 correct.

11 Q. Okay. And I'll take it, you remember seeing
12 wires in the photographs that APD had taken. No, I'm not
13 taking you through every one of them, but --

14 A. Yeah. No, I do.

15 Q. Okay. So they apparently were there and left
16 them there to the point where at least one you found when
17 you got there.

18 A. That's correct.

19 Q. All right. How about probes; do you ever see
20 probes?

21 A. I don't have them in my report, so I do not -- I
22 do not recall seeing probes.

23 Q. But you know probes -- clearly, there were
24 probes, if my client got Tased, that landed. Right?

25 A. That's correct.

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1 Q. At some point in time, somebody had to take it
2 out of him unless it's sitting in his back today and we
3 know that's not true.

4 A. That's correct.

5 Q. All right. So you have no information of the
6 probes.

7 A. I don't.

8 Q. All right. And relative to the cartridge that
9 you saw or -- I don't want to put -- use the wrong
10 word -- by that Placard No. 1?

11 A. Oh, the AFID. Correct.

12 Q. AFID. Obviously, that was there when you got
13 there?

14 A. That's correct.

15 Q. You don't remember seeing that in any APD photo,
16 do you?

17 A. I don't know. That -- I'll be -- you wouldn't
18 be able to see that in a photograph.

19 Q. Okay. Well, we can see it in yours.

20 A. Yeah, it -- they're very -- they're the size --
21 they're smaller than a pencil head. They're very, very
22 tiny.

23 Q. So if you think you found it and APD didn't when
24 they were there at the crime scene taking photos.

25 A. They didn't document it. I can't say whether

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1 they found it or did not.

2 Q. All right. So other than the dollar bill and
3 that AFID that you saw, was there anything else that you
4 documented that you thought was there at the scene that
5 you don't remember seeing in the APD photos?

6 A. Not that I recall.

7 Q. For Placard No. 2, what was near that again?

8 A. Placard No. 2 of mine, I believe, was the Taser
9 line, the wire.

10 Q. Okay.

11 A. Yes.

12 Q. All right.

13 MR. JOHNSON: Appreciate it, sir. Thank you
14 very much.

15 THE WITNESS: Thank y'all. Oh, I just -- are
16 we --

17 MS. NAIR: If I may have one moment. Just one
18 moment, please.

19 THE WITNESS: No problem.

20 (Whereupon, there was a brief pause in the
21 proceedings.)

22 MS. NAIR. Okay. Thank you for your time today.

23 THE WITNESS: Thank you.

24 MR. JOHNSON: Have a good day.

25 (Whereupon, the deposition concluded.)

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C E R T I F I C A T E

STATE OF GEORGIA,
COUNTY OF DEKALB:

I DO HEREBY CERTIFY THAT THE FOREGOING IS A TRUE AND
CORRECT TRANSCRIPT OF THE PROCEEDINGS TAKEN DOWN BY ME IN
THE CASE AFORESAID. THIS CERTIFICATION IS EXPRESSLY
WITHDRAWN AND DENIED UPON THE DISASSEMBLY OR PHOTOCOPYING
OF THE FOREGOING TRANSCRIPT, OR ANY PART THEREOF, UNLESS
SAID DISASSEMBLY OR PHOTOCOPYING IS DONE BY THE
UNDERSIGNED CERTIFIED COURT REPORTER AND ORIGINAL
SIGNATURE AND SEAL IS ATTACHED THERETO.

THIS, THE 15TH DAY OF FEBRUARY, 2021.

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